

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

NADIA MURAD, A.A., A.A., A.A., A.B., A.K., )  
ABAS ALHAMI, ABAS ZAGHLA, ABEER )  
KAREEM, ABID KASSIM, ABLA AMY, )  
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HASKAN, AZEEZAH ARAB, AZZAT )  
ALDAKE, B.K., BABEIR KHUDIDAH )

**AMENDED COMPLAINT**

**No. 1:23-cv-09186 (NGG)**

**JURY TRIAL DEMANDED**

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 SHEELAN JADAAN, SHEREEN MURAD, )  
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LAFARGE S.A., LAFARGE CEMENT )  
HOLDING LIMITED and )  
LAFARGE CEMENT SYRIA S.A., )  
 )  
Defendants. )

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## **INTRODUCTION**

1. This Anti-Terrorism Act (“ATA”) case is brought on behalf of members of the Yazidi community who are U.S. citizens and were injured by terrorist attacks carried out by the Islamic State in Iraq and Syria (“ISIS”). On August 3, 2014, the entire world watched as ISIS attacked Yazidi villages in northern Iraq, destroying everything in sight and forcing the Yazidis to flee to the barren Sinjar Mountain. Thousands of Yazidis were murdered and kidnapped. Many died of starvation and dehydration. Yazidi women who survived were sold as sex slaves while boys were forced to become child soldiers for ISIS. Hundreds of thousands of Yazidis ultimately fled to internally displaced persons camps in Kurdistan. The Yazidis’ once idyllic mountainside villages were left abandoned in a sea of rubble.

2. On October 18, 2022, the Department of Justice (“DOJ”) announced its first-ever prosecution of a corporation for conspiring to provide material support to a terrorist organization. According to Deputy Attorney General Lisa O. Monaco, Lafarge S.A. (“Lafarge”), and Lafarge Cement Syria S.A. (“LCS”) (with Lafarge Cement Holding Limited (“Lafarge Cyprus”), “Defendants”) “partnered with ISIS, one of the most brutal terrorist organizations the world has ever known, to enhance profits and increase market share—all while ISIS engaged in a notorious campaign of violence during the Syrian civil war.”

3. As part of their guilty plea, Defendants Lafarge and LCS<sup>1</sup> agreed to a 52-page Statement of Facts detailing their unlawful conduct (“Statement of Facts” or “SOF”). These factual admissions established Lafarge and LCS’s criminal liability under the ATA, 18 U.S.C. § 2339B(a)(1), and give rise to civil liability under the ATA, 18 U.S.C. § 2333. The Statement of

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<sup>1</sup> Plaintiffs have also named Lafarge Cement Holding Limited, a wholly-controlled Lafarge subsidiary, as a defendant. Lafarge merged with Holcim Ltd. in 2015 to become one of the largest cement manufacturers in the world, generating over \$32 billion in net sales in 2022.

Facts is incorporated into this Complaint in its entirety.<sup>2</sup> See *United States v. Lafarge S.A. et al.*, No. 1:22-cr-00444 (E.D.N.Y. Oct. 18, 2022), ECF No. 10.<sup>3</sup>

4. Lafarge and LCS admitted in the Statement of Facts that they paid nearly \$6 million dollars to ISIS and another terror group between August 2013 and October 2014. Specifically, Lafarge and LCS admitted that they paid \$5.92 million to and for the benefit of ISIS and Al-Nusra Front (“ANF”) during this period, and that they attempted to conceal these payments.

5. Of the \$5.92 million in payments made to ISIS and ANF, Lafarge and LCS admitted that \$3,447,528 was paid directly to ISIS-controlled suppliers. And their admissions make clear that at least \$585,000 of the monthly donations paid to armed groups went directly to ISIS<sup>4</sup>—meaning that they gave more than \$4 million to ISIS and ISIS-controlled entities. Lafarge and LCS also admitted that ISIS secured an additional \$3.21 million by selling the cement it took from the Cement Plant when LCS evacuated in September 2014—which adds up to a total of \$7.21 million in value for ISIS and ISIS-controlled entities.

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<sup>2</sup> The Statement of Facts is incorporated except to the extent that it is inconsistent with the facts pleaded in this complaint. Plaintiffs’ investigation has also revealed additional facts beyond those to which Lafarge and LCS have admitted in connection with their guilty plea. Upon information and belief, the factual admissions in connection with the guilty plea were limited by design and carefully crafted in an effort to avoid civil liability like that threatened by the instant proceedings. Allegations beyond those in the Statement of Facts are drawn from academic and news reports including about internal documents from Lafarge, Plaintiffs’ experiences, testimony from the Yazidi community, and other independent investigations. Some documents referenced are discussed in *Foley et al. v. Lafarge S.A. et al.*, 23-cv-05691 (E.D.N.Y.), a case related to this one, based on similar acts of the same Defendants. Counsel has relied on the well-pleaded allegations as made in *Foley*.

<sup>3</sup> In announcing the guilty plea, the DOJ indicated that Lafarge and LCS did not fully cooperate with its investigation. But Lafarge and LCS agreed in the guilty plea that they “will not dispute the Statement of Facts.”

<sup>4</sup> These monthly donations are calculated on the basis that from November 2013 Lafarge and LCS admitted to monthly payments to ISIS of \$38,000 and from May 2014 Lafarge and LCS admitted monthly payments to ISIS of \$71,400. SOF ¶¶ 44, 47. Lafarge and LCS have admitted to making payments to and for the benefit of ISIS until October 2014. SOF ¶ 19.

6. But, the total amount of payments that Lafarge gave ISIS and other armed groups around the Cement Plant is actually closer to \$15.5 million.<sup>5</sup> A Lafarge executive himself said that Defendants had given ISIS “ten millions” by mid-2014.<sup>6</sup> And a publicly available intelligence report also indicates that ISIS in fact secured at least \$11.5 million by selling the cement it took from the Cement Plant, on top of the millions of dollars’ worth of cement that Defendants sold directly to ISIS.

7. The DOJ reported that the conspiracy participants, including LCS, its intermediaries, and the terrorist groups, gained approximately \$80.54 million through the conspiracy. The actual amount of revenue for participants may be even higher. The money and cement Defendants supplied ISIS went directly to ISIS’s operations at precisely the time it was committing acts of international terrorism, including the slaughter of innocent people such as the Yazidis. Meanwhile, according to its plea with the DOJ, Lafarge ultimately made over \$70 million in total sales revenue through its conspiracy with ISIS.<sup>7</sup> On information and belief, ISIS also used Defendants’ cement to construct a network of underground tunnels used to shelter its fighters and weapons and transport, trap, and torture hostages including Yazidis. And when Lafarge evacuated the Cement Plant, ISIS also gained access to tons of raw materials, including supplies of hydrazine, a chemical used to produce explosives.

8. Documents indicate that Defendants’ conspiracy with ISIS was authorized at the specific direction of the companies’ highest management levels, including the CEOs of both

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<sup>5</sup> Press Release, Nadia’s Initiative, *Paris Court of Appeals Confirms Charges Against French Multinational Lafarge for Complicity in Crimes Against Humanity Committed by ISIS* (May 22, 2022), <https://www.nadiasinitiative.org/news/paris-court-of-appeal-confirms-charges-against-french-multinational-lafarge-for-complicity-in-crimes-against-humanity-committed-by-isis>.

<sup>6</sup> See *infra* Part IV(e). It is unclear from the face of the email to what currency the sender is referring.

<sup>7</sup> SOF ¶ 20.

Lafarge and LCS. Transactions in furtherance of this criminal conspiracy were purposefully made in U.S. dollars and transferred through and processed in New York.<sup>8</sup> And Defendants did not take steps to unwind the conspiracy until much later, after the criminal conspiracy was publicly exposed.

9. At the time of Defendants’ dealings with ISIS, the group had long been designated as a Foreign Terrorist Organization (“FTO”) by the United States—first as Al-Qaeda and its offshoots and then, on May 15, 2014, by its ISIS name and aliases.<sup>9</sup> These FTO designations, still in force today, mean that transacting with this group gives rise to criminal and civil liability. It is a crime under 18 U.S.C. § 2339B(a)(1) to knowingly provide material support to an FTO knowing that the organization has been designated as such. Similar legal prohibitions and criminal offenses exist under other countries’ laws.<sup>10</sup>

10. Defendants were, of course, well aware of this. LCS’s security advisor observed publicly that “The ISI [Islamic State of Iraq] and later ISIS/ISIL had been listed as a terrorist group since 2004 by the USA, the UN, and the EU.” And internal notes from a September 11, 2013 meeting of Lafarge’s Security Committee relayed challenges of dealing with armed militants “classified as terrorists by international organizations and the US.”<sup>11</sup>

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<sup>8</sup> See *infra* Part VII(a).

<sup>9</sup> The U.S. designated Al-Qaida in Iraq (“AQI”) as an FTO on October 15, 2004. On May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section I (b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as an alias of Al-Qaida in Iraq. The Secretary of State also added the following aliases to the FTO listing: The Islamic State of Iraq and Al-Sham (“ISIS”); The Islamic State of Iraq and Syria; ad-Dawla Al-Islamiyya fi Al-Iraq wa-sh-Sham; Daesh; Dawla Al Islamiya; and Al-Furqan Establishment for Media Production. ISIS remains a designated FTO to the present.

<sup>10</sup> It is a crime to fund a proscribed organization under the United Kingdom Terrorism Act, § 15 (2000), European Union Council Framework Decision 2002/475/JHA (2002), French Criminal Code Article 421-2-2 (2001), and U.N. Resolution 54/109 (1999).

<sup>11</sup> SOF ¶ 31.



11. Defendants were able to conceal their conspiracy with ISIS and its intermediaries for so long because, among other things, they took extraordinary steps to repeatedly and systematically route financial transactions and email traffic in furtherance of the conspiracy through the United States, using U.S. dollars as their currency. They undertook these activities in the United States purposefully in order to cover their tracks and avoid the scrutiny of Lafarge's French auditors and law enforcement officials.

12. Because Defendants aided and abetted ISIS's acts of international terrorism and conspired with ISIS and its intermediaries, they must pay compensation to the survivors. In this civil action under the ATA, U.S. citizens from the Yazidi community harmed by ISIS's acts of international terrorism committed in conspiracy with and aided and abetted by Defendants seek to collect the treble damages and attorney's fees authorized by the ATA for Defendants' violations thereof.

### **BACKGROUND**

13. On August 3, 2014, the world watched as ISIS launched a brutal, premeditated campaign to destroy the Yazidis, an ethnic and religious minority living primarily in the villages of Sinjar, a mountainous area in north-west Iraq. Unprepared and undefended, Yazidi families were driven out of their homes with unimaginable barbarity. Thousands of Yazidi men and women were executed and thrown into mass graves solely because of their religious and ethnic identity. Young boys were kidnapped and taken to the front lines to become child soldiers or human shields on the battlefield. Thousands of young women and girls were captured and bought, sold, and traded as slaves to ISIS fighters for sexual abuse on a massive scale. Many remain missing to this day.

14. At the time ISIS launched this attack, it was already a designated FTO under U.S. law and was notorious for its brutal crimes, including executing civilians en masse, persecuting

non-Muslim communities, kidnapping and beheading civilians—including U.S. nationals—and killing and maiming children.

15. ISIS directed its violent campaign throughout the Middle East in order to forcibly acquire land to establish a “caliphate,” or Islamist religious empire. On June 29, 2014, ISIS announced that the caliphate was now to be known as the “Islamic State,” and that Abu Bakr Al-Baghdadi had been nominated as its “caliph,” or leader. The caliphate was highly centralized and organized, exercising military authority, exerting fiscal and administrative control, and implementing state-like bureaucratic governance structures in the territories it controlled.

16. At its peak, the organization had an estimated 40,000 foreign fighters from 110 countries in its ranks in Iraq and Syria. ISIS took increasing amounts of territory in the area, ultimately controlling land the size of the United Kingdom, encompassing over a third of the territory of both Iraq and Syria, and governing over eleven million people. The group’s reach ultimately extended beyond the region, and it became infamous for committing and inspiring terrorist acts in more than thirty countries around the world.

17. ISIS’s attack on Sinjar and other Yazidi areas in the summer of 2014 forced approximately 400,000 Yazidis to flee for their lives. Those who could escape directly from their villages went eastwards towards the Kurdistan region of Iraq (“Kurdistan”). Initially, families slept on the streets, piled into school buildings, or sheltered in houses that were still under construction. Those who had little warning of ISIS’s advance packed into cars, got on donkeys, or ran on foot to seek refuge on nearby Sinjar Mountain. There, tens of thousands of innocent Yazidis were besieged by ISIS without access to food, water, or medical care in the middle of the arid Iraqi summer. Families faced an awful choice: come down the mountain and be slaughtered, or stay and watch their children and elders die of thirst and hunger. Descriptions of starving Yazidis

flooded news channels across the world. Hundreds—including infants and young children—perished on the mountain.

18. Spurred to action by these atrocities, on August 7, 2014—four days after ISIS attacked Sinjar—President Obama announced humanitarian airdrops and targeted U.S. airstrikes on ISIS fighters surrounding the mountain as “a humanitarian effort to help save thousands of Iraqi civilians who are trapped on a mountain . . . facing almost certain death.” In explaining the strike to the American people, he noted that “these terrorists have been especially barbaric towards religious minorities, including Christian and Yazidis.” He also announced that ISIS had “called for the systematic destruction of the entire Yazidi people, which would constitute genocide” and that “chilling reports describe ISIL militants rounding up families, conducting mass executions, and enslaving Yazidi women.”

19. After tens of thousands of Yazidis had been trapped on Sinjar Mountain for over a week, local Kurdish militias opened a safe corridor so that those who survived could escape to Kurdistan. Those who could access the safe corridor and were physically able began the long walk to Kurdistan, some taking thirty hours, on foot and with minimal provisions. Eventually, after many weeks spent sleeping in the streets, most Yazidis moved into temporary camps in Kurdistan established for internally displaced persons. Almost ten years later, hundreds of thousands of Yazidis still live in these camps without access to education or basic healthcare, unable to return home to the villages that ISIS destroyed.

20. That same month, August 2014, ISIS began to publicly execute Americans. On August 19, 2014, ISIS executed American journalist James Foley and released a video of the horrific beheading, entitled “Message to America,” online. Two weeks later, on September 2, 2014, ISIS released a video of the beheading of Steven Sotloff, another American journalist, titled

“A Second Message to America.” The beheadings were front-page news across the world. This followed ISIS’s practice of kidnapping Americans, including 24-year-old humanitarian worker Kayla Mueller, who was kidnapped in 2013, raped by ISIS leader Abu Bakr Al-Baghdadi, and later killed while in ISIS captivity.

21. Lafarge was at the time the owner of a cement plant in Jalabiyeh, northern Syria (the “Cement Plant”), which was operated by its subsidiary, LCS.<sup>12</sup> Unlike other multinational companies, which halted their Syrian operations and fled Syria when the civil war broke out in 2011, Defendants saw opportunity in partnering with the terrorists. By August 2014, Lafarge had already been sending millions of dollars to armed groups—including by making monthly “donations” to ISIS, paying ISIS based on the volume of cement LCS sold, purchasing raw materials from ISIS-controlled suppliers, and selling cement for ISIS’s own use.

22. To conceal its transactions with terrorists, Defendants worked through intermediaries. As one LCS security consultant admitted, “it was especially important that the relationship would be handled by [intermediaries], since an exposure of this sort would have been compromising for LCS. But via [intermediaries], we did in fact contribute to the economy of ISIS.”

23. Indeed, it was precisely in August 2014, when the drumbeat of ISIS’s terror was at its loudest, that Defendants finalized a significant deal with ISIS. In the midst of the horrors being inflicted on the Yazidis, Lafarge entered into a formal long-term revenue-sharing agreement with ISIS<sup>13</sup>—flying in the face of U.S. and international law and aiding and abetting ISIS’s crimes against humanity that were displayed daily on their screens. In doing so, Lafarge ramped up its

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<sup>12</sup> SOF ¶ 2.

<sup>13</sup> SOF ¶ 86.

financial support for the terror group at the precise time when funding would assist the group's most barbaric activities.

24. Specifically, on August 5, 2014, just two days after ISIS launched its widely-publicized attack on Yazidi villages and while thousands of Yazidis struggled for their lives on and around Sinjar Mountain, Firas Tlass—who Lafarge used as an intermediary to ISIS—sent Fredric Jolibois, Lafarge's Executive Vice President of Operations, a draft of the proposed revenue-sharing agreement between LCS and ISIS with terms that would give ISIS a fixed percentage of the profits from Lafarge's cement sales.

25. Emails show that on August 6, 2014, the day after the U.N. Security Council condemned ISIS's "systematic persecution of individuals from minority populations," Jolibois confirmed to Tlass Lafarge's and LCS's agreement to share 10 percent of Lafarge's profits with ISIS in return for ISIS's agreement to stop importation of or tax competitors' cement. Defendants' negotiations with ISIS continued alongside daily news reports of ISIS's barbarity and U.N. reports of a Yazidi genocide in the making.

26. On August 15, 2014, the U.N. Security Council issued Resolution 2170 condemning "any engagement in direct or indirect trade" with ISIS, "underscoring that these resources will support their future terrorist activities."<sup>14</sup> On or about the same day, an intermediary recommended that Lafarge executives agree to ISIS's revised terms including, amongst other demands, a fixed supply of LCS's cement production and a percentage of the value of LCS's raw

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<sup>14</sup> The U.N. Security Council also called on all U.N. member states to prohibit all financial and trade relations with ISIS, ANF, and Al-Qaeda, and named individuals subject to travel restrictions, asset freezes, and other measures targeted at Al-Qaeda affiliates. Abu Bakr Al-Baghdadi, ISIS's declared caliph, was not among the six because he had already been listed since 2011. Press Release, United Nations, Department of Public Information, *Security Council Adopts Resolution 2170 (2014) Condemning Gross, Widespread Abuse Of Human Rights by Extremist Groups in Iraq, Syria*, SC/11520 (August 14, 2014) <https://press.un.org/en/2014/sc11520.doc.htm>.

materials.<sup>15</sup> Lafarge subsequently accepted these terms in return for ISIS’s agreement to, amongst other measures, impose taxes on competitors’ cement.<sup>16</sup> An email sent to Lafarge executives as the deal was being finalized asked: “Is Lafarge able to bear a loss of about \$600 million, because we are operating in a difficult situation? . . . As long as we are selling and are able to overcome the obstacles, we should continue.”<sup>17</sup> And that is exactly what Defendants did.

27. Defendants were fully aware throughout their partnership with ISIS that they were transacting with terrorists and that their conduct flagrantly violated U.S. and international law, as their internal documents show.<sup>18</sup> Indeed, initially, Lafarge’s agreements with ISIS were even signed on ISIS letterhead, stamped with ISIS stamps, and referenced LCS by name<sup>19</sup> until Bruno Pescheux, CEO of LCS until July 2014, noted in an email to an employee that “we all have to stop [using] the acronym of an organization which is on terrorist lists.”

28. But Defendants continued conspiring with ISIS because Defendants received crucial benefits in exchange for these payments. ISIS permitted LCS access to raw materials sourced from the expanding territory and markets under its control, and ISIS agreed to impose costs on competing cement from Turkey to boost Defendants’ sales. ISIS—quite literally—agreed to neutralize Defendants’ competition. Defendants in turn referred to their “profit” as a “cake” and stated they were happy to “share” a slice with ISIS so long as ISIS continued to protect and promote Defendants’ interests.<sup>20</sup>

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<sup>15</sup> SOF ¶ 81.

<sup>16</sup> SOF ¶¶ 83, 86.

<sup>17</sup> SOF ¶ 46. All citations to written correspondence include original spelling, punctuation, and grammar.

<sup>18</sup> E.g., SOF ¶ 84.

<sup>19</sup> E.g., SOF ¶¶ 36, 88.

<sup>20</sup> SOF ¶ 73.

29. ISIS was strongest when it was able to maintain control over and expand territory by intimidating, threatening, and killing the people who stood in its way, pitting groups against one another and silencing potential opponents with fear. ISIS made great efforts to publicize gruesome details of its atrocities, and a key part of its expansion strategy was the development of a reputation as a brutal and ruthless actor with the ability to instill fear in its enemies and anyone else in its path. Capturing and slaughtering Yazidi civilians under its control and kidnapping and selling women and girls were potent ways for ISIS to expand and maintain its grip on power. When ISIS committed genocide against the Yazidi community, it grew its own influence and territory and bolstered its infamy.

30. The greater ISIS's control, the more Lafarge benefitted from the conspiracy. And the conspiracy was integrally linked to the United States. Harming and killing foreigners, especially Americans, whom ISIS referred to as "crusaders," was a potent way for ISIS to maintain and expand its grip on power, territory, and markets. By taking on a global power like the United States and killing Americans, ISIS terrorized its subjects, recruited new followers, and deepened its territorial reach. And Defendants knowingly benefitted from ISIS's ability to control local markets, allowing them to increase profits.

31. The United States has long designated Al-Qaeda and its offshoots as FTOs and added ISIS by name and alias on May 15, 2014.<sup>21</sup> These FTO designations, still in force today, mean that transacting with this group gives rise to criminal and civil liability. It is a crime under

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<sup>21</sup> The United States Secretary of State designated Al-Qaeda in Iraq ("AQI") as an FTO on October 15, 2004. On May 14, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section I (b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant ("ISIL") as an alias of Al-Qaida in Iraq. The Secretary of State also added the following aliases to the FTO listing: The Islamic State of Iraq and Al-Sham; The Islamic State of Iraq and Syria ("ISIS"); ad-Dawla Al-Islamiyya fi Al-Iraq wa-sh-Sham; Daesh; Dawla Al Islamiya; and Al-Furquan Establishment for Media Production. ISIS remains a designated FTO to the present.

18 U.S.C. § 2339B(a)(1) to knowingly provide material support or resources to an FTO knowing that the organization has been designated as such. Similar legal prohibitions and criminal offenses exist under other countries' laws, such as the United Kingdom Terrorism Act, § 15 (2000), European Union Council Framework Decision 2002/475/JHA (2002), and French Criminal Code Article 421-2-2 (2001).

32. Defendants were, of course, well aware of this. LCS's security advisor observed publicly that "The ISI [Islamic State of Iraq] and later ISIS/ISIL had been listed as a terrorist group since 2004 by the USA, the UN, and the EU." And internal notes from a September 11, 2013 meeting of Lafarge's Security Committee relayed challenges of dealing with armed militants "classified as terrorists by international organizations and the US."<sup>22</sup>

33. Realizing they were brazenly violating the law, Lafarge and its executives tried to cover their tracks. They interacted with ISIS through intermediaries and paid it using shell companies in the United Arab Emirates.<sup>23</sup> And when they felt the pressure mounting, they backdated a termination agreement with their intermediary to pretend the relationship had ended.<sup>24</sup> Defendants purposefully availed themselves of the U.S. financial system and email services based in the United States to conceal their illegal activities from their auditors and French law enforcement authorities. Defendants' executives decided to switch from cash payments to U.S. dollar transfers routed through New York correspondent banks because cash transactions appeared suspicious.<sup>25</sup> And Lafarge's in-house lawyer instructed employees not to create email records of

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<sup>21</sup> SOF ¶ 31.

<sup>23</sup> SOF ¶ 97.

<sup>24</sup> SOF ¶ 99.

<sup>25</sup> SOF ¶ 60.



transactions using their business email addresses.<sup>26</sup> Instead, they used personal email addresses registered in the United States to communicate about their dealings with ISIS.<sup>27</sup>

34. In their plea deal with the DOJ, Lafarge and LCS admitted to making payments of at least \$5.92 million to and for the benefit of ISIS and ANF from at least August 2013 through October 2014. These payments consisted of at least \$816,000 in monthly “donations;” at least \$3,447,528 in payments to ISIS-controlled suppliers; and at least \$1,654,466 in payments based on the amount of cement LCS sold.<sup>28</sup>

35. But Defendants’ own documents suggest their total payments to terrorist groups were far higher—exceeding \$15.5 million according to the ongoing criminal investigation into Lafarge and its executives by French authorities.<sup>29</sup> By way of example, a July 14, 2014 email written to LCS’s CEO refers to even more payments “in addition to the ten millions that we pay directly to them, i.e. to ISIS.” *See infra* Part IV(e).<sup>30</sup> In addition, Lafarge entered into a written contract in October 2014, drafted to apply retroactively, obligating it to continue to make U.S. dollar payments indefinitely to an intermediary, money destined for terrorists, described *infra* Part V(c).

36. When ISIS ultimately seized the Cement Plant in September 2014, it took the cement that LCS had produced and left behind. Though Defendants admitted that ISIS sold the cement at prices that yielded approximately \$3.21 million, the amount of cement that ISIS seized

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<sup>26</sup> SOF ¶ 88.

<sup>27</sup> SOF ¶ 18.

<sup>28</sup> SOF ¶ 19.

<sup>29</sup> Press Release, Nadia’s Initiative, *Paris Court of Appeals Confirms Charges Against French Multinational Lafarge for Complicity in Crimes Against Humanity Committed by ISIS* (May 22, 2022), <https://www.nadiasinitiative.org/news/paris-court-of-appeal-confirms-charges-against-french-multinational-lafarge-for-complicity-in-crimes-against-humanity-committed-by-isis>.

<sup>30</sup> The email communication likely refers only to one type of payment to ISIS at one point in time. Lafarge made numerous types of payments to ISIS over a lengthy period of time. *See infra* Part IV.

was likely sold for at least \$11.5 million. The negotiations to sell the cement were conducted with Lafarge's knowledge and with the participation of its intermediary.

37. Accordingly, the actual value of the funds that Defendants provided to ISIS and ISIS-controlled entities and the profits generated from the sale of cement was likely over \$15 million.<sup>31</sup> And this does not account for the fact that Defendants actually gave ISIS more money than they admitted, or the value of the cement Defendants gave to ISIS before they evacuated the Cement Plant.

38. The millions of dollars that Lafarge has admitted to paying ISIS and ISIS-controlled entities was enough to fund the attack on Sinjar many times over. *See supra* ¶¶ 4–5. ISIS's attack on Sinjar was not a particularly complex military operation—given that it was attacking unarmed civilians, it is estimated that the number of fighters involved in the invasion was only in the hundreds. And these fighters came cheap. Just \$400 could cover one terrorist's salary for the month. Even if the invasion of Sinjar required 500 ISIS fighters, their salaries for the entire month of August would have cost only \$200,000—barely a dent in the piles of cash that Lafarge paid ISIS. These attacks were the foreseeable, obvious, and only possible result of doing business with ISIS, a group whose sole purpose was the creation of an Islamic state through the slaughter and violent destruction of other communities. Terrorist attacks enabled ISIS to maintain and expand its control over territories. And the more territory and markets ISIS controlled, the greater the co-conspirators' profits.

39. Defendants' payments were channeled through ISIS's centralized and carefully tracked financial system to fund ISIS's terrorist attacks. According to a U.N. investigation, ISIS's

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<sup>31</sup> This comprises \$3,447,528 that Lafarge and LCS admitted paying to ISIS-controlled suppliers, an estimated \$585,000 in monthly donations to ISIS, and \$11,500,000 in alleged cement sales. *See supra* ¶¶ 4–6.

central treasury provided “vital material and financial support [to ISIS’s] ministry of the army, and specifically those units . . . that are alleged to have committed international crimes.”

40. Pursuant to ISIS’s practices, 20 percent of the funds provided by ISIS would have been specifically channeled to its Leadership Cell, which was headed by ISIS’s founder and leader Abu Bakr Al-Baghdadi, *see infra* Part VI(c), who himself imprisoned, tortured, and raped Yazidi women and girls as well as a young American humanitarian worker named Kayla Mueller. ISIS’s Leadership Cell played a central role in planning ISIS’s expansion strategy and armed attacks, like those on Sinjar, and ISIS publicly confirmed that it deployed its “taxes”—money collected from people and businesses in ISIS’s territory—to support “[t]he mujahidin [fighters] and [terrorist attacks that it called] jihad.”

41. Lafarge’s money was also channeled to Raqqa, the center of ISIS’s military planning operations and slave trade. *See infra* Part VI(d). Lafarge and LCS have admitted that its employees and representatives travelled to Raqqa, the self-declared capital of the caliphate and administrative headquarters of ISIS, to meet with ISIS representatives and contacts and negotiate payments.<sup>32</sup> Thousands of women, including Plaintiff Suad Ketî and other Plaintiffs’ family members, were taken to Raqqa to be catalogued, sold, and enslaved by ISIS members. The Raqqa Cell was run by Ali Musa Al-Shawakh, more commonly known as Abu Luqman, who was also a central figure in ISIS’s Leadership Cell. According to news reports, Abu Luqman was in contact with Lafarge and even served on the “shadow board” of the Cement Plant. Abu Luqman also negotiated access to cement from the Cement Plant that Lafarge left behind for ISIS when its workers fled the plant, in the presence of Lafarge intermediary Amro Taleb.

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<sup>32</sup> SOF ¶¶ 45, 70.

42. On information and belief, ISIS also used Defendants’ cement to construct its network of underground tunnels, bunkers, cells, and fortifications, which it used to shelter its fighters and weapons from U.S. coalition forces, and to transport, trap, and torture hostages. In particular, Yazidi women—including a family member of a Plaintiff in this case—describe being held underground in Raqqa, a mere 52 miles from the Cement Plant. Moreover, when LCS evacuated the Cement Plant, ISIS gained access to tons of raw materials, including supplies of hydrazine, a chemical used to produce explosives.

43. Defendants’ conspiracy with ISIS and its intermediaries had substantial, purposeful connections to the United States. Defendants’ executives knowingly and deliberately relied on the U.S. financial system, causing numerous U.S. dollar-denominated wire transfers to pass through New York banks. Their reliance on U.S. banks was deliberate and strategic: Defendants called “USD” their “preferred option.”<sup>33</sup> Using U.S. dollars and New York correspondent banks made Defendants’ payments look legitimate, avoided sanctions complications associated with conducting banking transactions with persons located in Syria, and, as discussed above, avoided the scrutiny of French auditors and law enforcement.

44. Criminal prosecution of Lafarge and its executives is ongoing in France. The French Court of Appeal in Paris stated that “although informed that the actions of ISIS could constitute crimes against humanity, Lafarge . . . decided instead to continue . . . paying several million dollars to [ISIS and other terrorist] groups.”<sup>34</sup> France’s Supreme Court also confirmed that “knowingly paying several million dollars to an organisation whose purpose was exclusively

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<sup>33</sup> SOF ¶ 60.

<sup>34</sup> Press Release, Nadia’s Initiative, *Paris Court of Appeals Confirms Charges Against French Multinational Lafarge for Complicity in Crimes Against Humanity Committed by ISIS* (May 22, 2022), <https://www.nadiasinitiative.org/news/paris-court-of-appeal-confirms-charges-against-french-multinational-lafarge-for-complicity-in-crimes-against-humanity-committed-by-isis>.

criminal suffices to constitute complicity” in the crimes that were committed “regardless of whether the accomplice was pursuing a commercial activity.”

45. As part of its plea agreement with the DOJ in this District, Lafarge and LCS stipulated to a Statement of Facts and made a series of factual admissions establishing their criminal liability under the ATA, 18 U.S.C. § 2339B(a)(1), which also establish their civil liability under 18 U.S.C. § 2333. Specifically, Lafarge and LCS have admitted that:

- At the direction of Lafarge and LCS’s senior management, LCS was making payments to ISIS and ANF from at least August 2013 to October 2014;
- Executives conspired to make periodic payments to ISIS and ANF, including monthly “donations,” totaling approximately \$816,000;
- LCS paid fees for each truck allowed to pass through ISIS checkpoints;
- LCS purchased raw materials from ISIS-controlled suppliers, with payments totaling approximately \$3,447,528;
- LCS made payments to ISIS and other armed groups based on the amount of cement that LCS sold, with payments totaling approximately \$1,654,466;
- LCS entered a long-term revenue-sharing agreement granting ISIS ten percent of LCS’s cement, twenty-five percent of the value of LCS’s raw materials, payments based on the amount of cement sold, and payments for access to the Cement Plant;
- Lafarge’s “preferred” method to effect payment was U.S. dollar transactions via intermediary banks in New York City. *See infra* Part VII(a).

46. Based on the heinous conduct underlying their guilty plea, Defendants were sentenced to pay almost \$778 million in criminal fines and forfeiture to the U.S. government. But none of this money was earmarked for victims. Defendants have so far avoided paying any compensation to victims of their conspiracy with ISIS.

47. Plaintiffs in this action are Yazidis who are U.S. citizens. Many of them were, or had relatives who were, translators for the U.S. Army and served the United States. They are farmers, schoolteachers, housewives, and small business owners whose lives were upended on that fateful day in August 2014. Many of them lived in, owned properties in, and/or had family members living in the areas that came under ISIS attack on or around August 3, 2014. Others were in the United States during ISIS’s attack on Sinjar and had to watch in horror as ISIS attacked their

families, ransacked their homes, and destroyed their community. Some had to work multiple jobs or drop out of school to send money to their relatives who had fled with nothing but the clothes on their back.

48. There is not one Yazidi family whose lives were untouched by ISIS's brutality. The entire population in the Sinjar area was either killed, captured, or displaced. And the attacks on Sinjar were not the only ISIS attacks on Yazidi communities. For example, the villages of Bashiqa and Bahzani, northeast of Mosul, were invaded shortly after Sinjar. Yazidis in these villages lost everything when they fled in anticipation of ISIS's advance. It is estimated that more than 400,000 Yazidis were forced to flee, with around 200,000 (considered to be more than half the surviving population of Yazidis in the world today) still living in camps in Iraq and Syria. More than 5,000 Yazidi men and older women were killed. More than 6,000 women and children were abducted and sold into slavery, some as young as nine years old. Many of them were raped and gang raped over weeks and months by multiple ISIS fighters. Over 2,700 Yazidis are still missing today. Families were torn apart, homes and villages were reduced to ruins, and communities in which Yazidis lived for generations were destroyed. Ten years later, there has been little reckoning for these crimes, and no compensation or restitution for the victims.

49. Plaintiffs are entitled to recover for the severe mental anguish, extreme emotional pain and suffering, economic loss, loss of property, and/or loss of their family's society and counsel that they experienced as a result of Lafarge's criminal misconduct. Not only were these consequences a foreseeable risk of doing business with ISIS, they were the only possible outcome of conspiring with a group whose purpose was solely terrorism. Defendants aided and abetted the ISIS acts that killed or injured Plaintiffs and their family members, and destroyed their homes and

businesses. Defendants also conspired with ISIS and its intermediaries, making Defendants liable for the attacks that ISIS foreseeably committed in furtherance of their conspiracy.

### **THE PARTIES AND PRINCIPAL CO-CONSPIRATORS**

50. Plaintiffs are U.S. citizens who lived in, owned properties in, and/or had family members living in areas invaded and terrorized by ISIS on or around August 3, 2014 or earlier. As a result of ISIS's assaults, Plaintiffs were themselves injured or subject to brutal physical and sexual violence, lost family members, or lost their homes and businesses. All experienced extreme pain and suffering. Further details about each Plaintiff are set forth below.

51. Defendant Lafarge is the parent company of a multinational building materials business, which is organized under the laws of France and headquartered in Paris, France. At pertinent times, Lafarge, together with its subsidiaries, employed 63,000 people to manufacture and sell cement, construction aggregates, concrete, and other building materials at 1,612 production sites in approximately 61 countries, including the United States.<sup>35</sup> Lafarge oversaw and directed the conduct of Lafarge Cyprus and LCS, two subsidiaries that it wholly controlled. LCS made agreements and transactions with ISIS and ANF at the direction of Lafarge's and LCS's senior management. Lafarge executives were informed in detail of LCS's decisions and themselves gave directions to support doing business with the FTOs. As Christian Herrault, Executive Vice President of Operations at Lafarge, wrote in 2017, LCS's "local concessions" to terrorists "were made with the clear and repeated approval" of senior Lafarge leadership.<sup>36</sup> Thus, when allegations below refer to LCS or LCS employees, the described conduct occurred at Lafarge's direction and for Lafarge's benefit.

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<sup>35</sup> SOF ¶ 1.

<sup>36</sup> SOF ¶ 16.

52. On July 10, 2015, Lafarge merged with its leading competitor, Holcim Ltd., a Zurich, Switzerland-based building materials business, to create LafargeHolcim.<sup>37</sup> At the time of the merger, LafargeHolcim was the largest cement company in the world.

53. During all times pertinent to this complaint, Lafarge oversaw and directed the conduct of two subsidiaries it wholly controlled, LCS and Lafarge Cyprus.

a. **LCS** is a direct subsidiary of Lafarge Cyprus, organized under the laws of Syria and headquartered in Damascus, Syria. Lafarge indirectly owned 98.7 percent of LCS through four subsidiaries, primary among them Lafarge Cyprus. From approximately May 2010 to September 2014, Lafarge, through LCS, operated the Cement Plant in the Jalabiyeh region of northern Syria, located near the Turkish border and between the cities of Manbij and Raqqa, Syria.<sup>38</sup>

b. **Lafarge Cyprus** is the entity through which Lafarge held the majority of its shares in LCS until Lafarge's 2015 merger with Holcim. It is organized under the laws of Cyprus and headquartered in Cyprus. Lafarge Cyprus functioned as the corporate instrument through which Lafarge often routed money to LCS and intermediaries, including through international bank transfers that went through New York, and thereby financed Lafarge's payments to ISIS. Lafarge Cyprus's financing of LCS's transfers was done knowingly, at Lafarge's direction, and with Lafarge's approval. In 2014, Lafarge Cyprus executed a consulting agreement with Tlass to conceal Defendants' payments to ISIS.

54. Bruno Lafont is a citizen of France and was Lafarge's Chairman of the Board of Directors and CEO of Lafarge until the completion of the merger with Holcim in 2015. Upon

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<sup>37</sup> LafargeHolcim rebranded itself as Holcim Group in 2021.

<sup>38</sup> SOF ¶ 2.



Lafarge's merger, he became Co-Chair of LafargeHolcim's Board of Directors and served there until May 2017. He was based at Lafarge's headquarters in Paris, France.

55. Guillaume Roux is a citizen of the United States and of France and was an Executive Vice President of Lafarge until January 2016. Roux was also a member of Lafarge's Security Committee, a member of LCS's Board of Directors until January 2016, and its chairman from 2008 until July 4, 2013. Roux was based at Lafarge's headquarters in Paris, France and reported directly to Lafont.

56. Christian Herrault is a citizen of France and was an Executive Vice President of Operations of Lafarge from approximately 2012 to December 2015. Herrault supervised Lafarge's operating subsidiaries in numerous countries, including Syria. Herrault was also a member of Lafarge's Security Committee and, beginning on July 4, 2013, served as Chairman of the Board of Directors of LCS. Like Roux, who was Executive Vice President of Lafarge and also a member of LCS's Board of Directors, Herrault had a formal role in both Lafarge and LCS's corporate structure. Herrault was based at Lafarge's headquarters in Paris, France and reported directly to Lafont.

57. Bruno Pescheux is a citizen of France and was CEO of LCS from approximately 2008 to July 2014. While CEO of LCS, Pescheux was based at LCS's headquarters in Damascus, Syria before relocating to Cairo, Egypt in 2012 when LCS evacuated its foreign employees in the face of growing unrest around its plant. He reported directly to Herrault.

58. Fredric Jolibois is a citizen of France who became CEO of LCS in approximately July 2014 and remained in that role until approximately January 2016. He reported directly to Herrault until Herrault left Lafarge.

59. Jean Claude Veillard is a citizen of France and was Vice President of Security for Lafarge from approximately October 2008 until September 2017. He was based at Lafarge's headquarters in Paris, France. Veillard was also a member of Lafarge's Security Committee.

60. Firas Tlass is a citizen and national of Syria and was a minority shareholder in LCS until the Syrian government confiscated his shares in LCS in approximately 2012. Tlass was paid by LCS, with Lafarge's knowledge and approval, to provide "security" services to LCS, which included negotiating with various local terrorist groups, including ISIS and the ANF. Tlass was paid by LCS, with Lafarge's knowledge and approval, to negotiate with and deliver payments to ISIS and ANF.

61. Amro Taleb is a citizen of Canada and of Syria and a former consultant to LCS who held himself out as a broker capable of sourcing raw materials from ISIS-controlled territories. LCS paid Taleb to negotiate with and pay ISIS for raw materials, with Defendants' knowledge and approval. After ISIS raided the Cement Plant and shut it down, Taleb attempted to negotiate the sale of the remaining cement, while receiving payments from Defendants. As Lafarge and LCS's paid consultant, he then visited Lafarge's headquarters in Paris in January 2015 to discuss Defendants' further cooperation and plan to re-open the Cement Plant.

62. Defendants, through Veillard, Herrault, Pescheux, Jolibois, Roux, Lafont, Tlass, and Taleb, among others, acted in concert with ISIS, for the purpose of furthering their common objectives (Veillard, Herrault, Pescheux, Jolibois, and Taleb are also reported to be indicted in the French criminal proceedings against Lafarge). They conspired and worked in concert with ISIS with the full knowledge of ISIS's designation as an FTO, its terrorist acts, and its purposeful targeting of Americans and others.

## **JURISDICTION AND VENUE**

63. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331, 18 U.S.C. § 2333(d), and 18 U.S.C. § 2338 as a civil action brought by citizens of the United States who have been injured by reason of acts of international terrorism committed by ISIS.

64. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b), (c), and (d) and 18 U.S.C. § 2334(a).

65. Lafarge, Lafarge Cyprus, and LCS are subject to personal jurisdiction pursuant to 18 U.S.C. § 2334(a) and N.Y. C.P.L.R. § 302. In the alternative, if the Court concludes that Defendants are not subject to jurisdiction in any state's courts of general jurisdiction, Lafarge, Lafarge Cyprus, and LCS are subject to personal jurisdiction under Fed. R. Civ. P. 4(k). Jurisdiction under these provisions is appropriate based on the below.

66. Defendants' conspiracy with ISIS and its intermediaries had a substantial nexus to the United States and to New York, including by virtue of Defendants' and their agents' deliberate, repeated, and systematic use of U.S. dollar transactions and banks in New York to pay, conspire with, and aid and abet terrorists, including via intermediaries. Defendants' "preferred option" for paying terrorists was to make "bank transfer[s] in USD," because, among other things, it helped avoid detection by Lafarge's auditors and governmental entities.<sup>39</sup>

67. Specifically, Defendants directed their banks to complete U.S. dollar-denominated wire transfers to support their scheme to fund ISIS, because Defendants' officials knew those directions required the use of New York banks. Defendants' wire instructions caused their payments to clear in New York, including through one admitted suit-related transaction in this

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<sup>39</sup> SOF ¶ 60.

District.<sup>40</sup> Defendants' executives regularly received specific transaction confirmations alerting them to the particular U.S. correspondent and intermediary banks that routed their transactions. On information and belief, as part of the process of approving these transactions, Defendants regularly requested and received confirmations from their banks notifying them of the New York banks involved in clearing their transfers. *See infra* Part VII(a).

68. By routinely, purposefully, and knowingly conducting transactions in U.S. dollar-denominated transactions processed through New York, Defendants purposefully availed themselves of the benefit of doing business in the United States generally and New York specifically, and thus are subject to personal jurisdiction.

69. As Defendants knew, their aiding and abetting of and conspiracy with ISIS and its intermediaries enabled ISIS to commit acts of international terrorism, including acts that injured and killed members of the Yazidi community. Such acts also expanded ISIS's power and territorial control, benefitting Defendants.

70. In addition, as described further below, Defendants conspired with ISIS and its intermediaries to provide material support to ISIS, a designated terrorist organization, knowing that ISIS would use Defendants' material support to commit acts of violence that would endanger human life and would intimidate or coerce a civilian population, in violation of 18 U.S.C. 2333(a).

71. In furtherance of the conspiracy, Defendants purposefully made numerous payments to ISIS in U.S. dollars that were wired through New York. This was done at Lafarge's instruction and with its knowledge, in reliance on the U.S. financial system for efficiency, security, and secrecy.

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<sup>40</sup> SOF ¶ 103.

72. For example, Lafarge has admitted to making a lump sum wire transfer of \$210,000 from its operating account at a financial institution in Paris to intermediary banks in New York City through this District.<sup>41</sup> The contract pursuant to which that payment was made, and additional agreements made in the course of the conspiracy, required Defendants to make ongoing payments after October 2014.<sup>42</sup> On information and belief, Defendants did so.

73. Also in furtherance of the conspiracy, Defendants' executives regularly used personal email accounts serviced by U.S.-based email service providers, instead of their corporate email addresses, to coordinate and carry out elements of their partnership with ISIS.<sup>43</sup> U.S.-based email service providers enabled Defendants to conceal their illegal conduct from French auditors and authorities.

74. Further, Defendants are subject to personal jurisdiction given their participation in a scheme and conspiracy with ISIS and its intermediaries that was directed at the United States. *See infra* Part VII(c). Lafarge bought protection from and entered a complex conspiracy with ISIS, with the awareness that it was a terrorist group that targeted the United States and American citizens. As a result of the conspiracy between Defendants and ISIS, ISIS's overt acts targeting the Yazidi community, the international community, the United States, and Plaintiffs are attributable to Defendants.

75. In 2022, the DOJ brought criminal charges against Lafarge under 18 U.S.C. § 2339B, which prohibits persons from knowingly providing material support or resources to a foreign terrorist organization, and from attempting or conspiring to do so. Based on conduct that occurred "within the Eastern District of New York and the extraterritorial jurisdiction of the United

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<sup>41</sup> SOF ¶ 103.

<sup>42</sup> SOF ¶ 100.

<sup>43</sup> SOF ¶ 18.

States,” the DOJ charged Lafarge and LCS with conspiring to provide material support to terrorists.<sup>44</sup> The DOJ further charged that “the defendants were brought into and found in the United States, the offense occurred in part within the United States, the offense occurred in and affected interstate and foreign commerce, and the defendants conspired with a national of the United States.”<sup>45</sup> Based on these contacts with the United States, Lafarge and LCS “admit[ted] the Court’s jurisdiction over the Defendants and the subject matter of” that criminal case.<sup>46</sup> And the same conclusion follows in this civil suit.

## **FACTUAL ALLEGATIONS**

### **I. ISIS BECOMES THE WORLD’S MOST RUTHLESS TERRORIST GROUP**

76. In March 2011, after anti-government protests associated with the Arab Spring had spread across the region, Syrian police detained and tortured protestors. As mass protests erupted across the country, armed militias arose with the goal of overthrowing the Syrian government. Syria quickly descended into a full-scale civil war.

77. In August 2011, seeing an opportunity among the numerous armed factions battling in Syria, Al-Qaeda in Iraq (“AQI”) and Islamic State of Iraq (“ISI”) leader Abu Bakr Al-Baghdadi sent AQI operative Abu Muhammad Al-Julani into northeast Syria to organize the network of militant jihadist cells in Syria into one cohesive group. Al-Julani’s Al-Qaeda sub-group in Syria, ANF, wasted no time spreading terror throughout the region. Its first operation was a massive suicide bombing in Damascus, which killed over forty people in December 2011.

78. On December 11, 2012, the United States amended the FTO and Executive Order 13224 designations for Al-Qaeda to include ANF, under the following new aliases: Al-Nusrah

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<sup>44</sup> *United States v. Lafarge S.A. et al.*, No. 1:22-cr-00444 (E.D.N.Y. Oct. 18, 2022), ECF No. 4 ¶ 1.

<sup>45</sup> *Id.* at ECF No. 10 ¶ 3.

<sup>46</sup> *Id.* at ECF No. 4 10-2 ¶ 4.

Front; Jabhat Al-Nusrah; Jabhet Al-Nusra; The Victory Front; and Al Nusrah Front for the People of the Levant. In its accompanying press release, the Department of State warned that ANF “has sought to portray itself as part of the legitimate Syrian opposition while it is, in fact, an attempt by AQI to hijack the struggles of the Syrian people for its own malign purposes.”<sup>47</sup> To date, ANF remains a designated FTO.

79. The following April, threatened by ANF’s and Al-Julani’s increasing power, Al-Baghdadi (the Al-Qaeda leader who had originally sent Al-Julani to Syria) declared the formation of Al-Dawlah Al-Islamiyah fi Al-‘Iraq wa Al-Sham (The Islamic State of Iraq and Syria, “ISIS”). Al-Baghdadi declared that, under his leadership, ISI and ANF would merge into a single Sunni Islamist organization, ISIS. ISIS’s stated goal was to seize control first of Iraq and Syria and then beyond, to form a unified religious state across national boundaries, a “caliphate.” ISIS sought to violently impose its religious beliefs on all those who opposed them.

80. ANF’s head, Al-Julani, objected to Al-Baghdadi’s declaration, and publicly pledged allegiance to Al-Qaeda leadership. ANF and ISIS then quickly became rivals in the jihadist community, competing for international legitimacy and Syrian and Iraqi territory. Through brute force, ISIS took the upper hand and seized Raqqa and other cities and villages across Syria and Iraq starting in January 2014. ISIS was more successful than ANF, in part because of its extreme brutality and global ambition, but also because of its greater resources, including money, weapons, and fighters. ANF leaders began defecting to ISIS.

81. Unlike most of the other militant groups fighting in Syria in opposition to the Syrian government, ISIS did not target Syria alone. Its goal, as Defendants knew, was the construction

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<sup>47</sup> Press Release, U.S. Dep’t of State, *Terrorist Designations of the al-Nusrah Front as an Alias for al-Qa’ida in Iraq* (Dec. 12, 2012), <https://2009-2017.state.gov/r/pa/prs/ps/2012/12/201759.htm>.

of a self-described “caliphate” or empire. The U.S. government and others categorically rejected any suggestion that ISIS, despite its name, was a “state,” that it had any legitimate governmental function, or that it did anything other than propagate terrorist violence. ISIS maintained and expanded its control over civilian populations using violence and fear, rather than legitimate governance. It solidified its control by entering into criminal conspiracies like the one it had with Defendants, and by attacking foreign powers, including the United States. Its acts of mass terrorism violated international law, including the laws of war, and included kidnapping, human trafficking, rape, and murder.

82. Many of ISIS’s acts were intended to intimidate and silence its opponents. Its fighters patrolled the streets with weapons and suicide vests. To sow fear among the local populations, ISIS shot opponents from behind (including children), beheaded them, lit them on fire, and hung them in public squares, as early as 2013.

83. ISIS also kidnapped and murdered journalists and aid workers from countries around the globe from 2013. As described further below, their victims were frequently beheaded, sometimes on videos broadcasted online for the world to watch.

84. According to the U.N. Human Rights Council, ISIS “made calculated use of public brutality and indoctrination to ensure the submission of communities under its control.” Its aim was “to subjugate civilians under its control and dominate every aspect of their lives through terror . . . .”

85. Thousands of foreign fighters, including Americans convicted in this District,<sup>48</sup> flocked to join ISIS’s ranks. The assurance of marriage and the proffer of sexual slaves was one

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<sup>48</sup> Press Release, U.S. Attorney’s Office for the Eastern District of New York, *High Level Members of ISIS Sentenced to Life in Prison for Material Support to a Foreign Terrorist Organization Resulting in Death* (July 14, 2023),



of the perks ISIS offered foreign enlistees, in addition to a paycheck. Over 40,000 foreign fighters interested in ISIS's extreme jihadist ideology ultimately joined the group in Iraq and Syria.

86. Lafarge was aware that foreign fighters and defectors from other terrorist groups were increasing ISIS's ranks. Its security consultant concluded that the group's membership came at first from Iraqi fighters and ANF defectors, but that as time went on, "jihadi tourists" (as he called them) came to Syria and Iraq to join the group and commit terrorist attacks. But this did not deter Defendants from entering into a multi-million-dollar deal with its operatives.

87. To grow as quickly as it did from a small armed group in 2013 to an international terrorist organization with swaths of territory in 2014, ISIS needed money—and a lot of it. ISIS robbed the resources under its control, including by looting banks, pumping oil and gas to sell on the black market, taxing 'un-Islamic' behavior according to its corrupt codes, and selling humans as sexual slaves.

88. Capturing cement plants was also an essential part of ISIS's growth plan. Cement plants were a particularly appealing target for a number of reasons, including that they generated significant revenue from which ISIS could pilfer; they produced the much-needed material to fortify ISIS's tunnels and bunkers; and they contained raw materials that ISIS could use to create explosives. Between its territory in Syria and Iraq, ISIS ultimately seized five cement plants, which could produce a total of \$583 million in annual revenue. But even before ISIS overran Lafarge's Cement Plant and seized all the materials LCS left behind, Defendants and ISIS had become close partners, pursuing common objectives and generating tens of millions of dollars in profit.<sup>49</sup>

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<https://www.justice.gov/usao-edny/pr/high-level-member-isis-sentenced-life-prison-material-support-foreign-terrorist>.

<sup>49</sup> It is unclear from the face of the email to what currency the sender is referring.

## **II. ISIS COMMITS GENOCIDE AGAINST THE YAZIDIS**

89. On August 3, 2014, ISIS launched a coordinated attack against the Yazidis in Sinjar, Iraq, and began a campaign of violence against this community and other minorities. Just a few days after the invasion, the U.N. Security Council condemned ISIS's "systematic persecution of individuals from minority populations," recalling that "widespread or systematic attacks directed against any civilian populations because of their ethnic background, religion or belief may constitute a crime against humanity." President Obama warned that the well-publicized expulsion and entrapment of Yazidis on Sinjar Mountain could constitute an "act of genocide."

90. ISIS's attack came to be recognized as constituting not only war crimes and crimes against humanity but also genocide, both in the United States and internationally.

91. Genocide is a violation of U.S. law, including 18 U.S.C. § 1091, which makes it illegal to kill or injure a national, ethnic, racial, or religious group. And both U.S. government officials and elected representatives have concluded that ISIS committed this crime against Yazidi victims. On March 17, 2016, Secretary of State John Kerry announced that ISIS had killed Yazidi civilians and enslaved thousands of women and girls, "selling them at auction, raping them at will and destroying the communities in which they had lived for countless generations." He concluded that "[ISIS] is responsible for genocide against groups in areas under its control, including Yazidis"—the first declaration of genocide the U.S. had made in over a decade (since Darfur in 2004). Similarly, both the U.S. Senate and the House of Representatives passed unanimous resolutions finding that "atrocities perpetrated by the Islamic State . . . against religious and ethnic minorities in Iraq and Syria include war crimes, crimes against humanity, and genocide" including of Yazidis.

92. Similarly, a U.N. report concluded in 2016 that ISIS "committed the crime of genocide as well as multiple crimes against humanity and war crimes against the Yazidis,"

dragging thousands into captivity in Syria, including women and girls as sex slaves and boys as child soldiers, “where they are subjected to almost unimaginable horrors.”

93. In 2017 the U.N. Security Council established the U.N. Investigative Team to Promote Accountability for Crimes Committed by Da’esh/ISIL (“UNITAD”) to collect evidence of acts that might amount to war crimes, crimes against humanity, and genocide in order to “creat[e] criminal dossiers for use before national courts.” UNITAD focused on crimes against Yazidis and gathered and analyzed testimonial accounts from thousands of witnesses and victims. It also analyzed digital evidence extracted from captured ISIS devices including facial recognition analysis of photographs and videos; analysis of immigration and medical records, payment logs, and fighter rosters; and forensic analysis of evidence extracted from mass graves.

94. UNITAD’s on-the-ground investigation was led by the incumbent prosecutor of the International Criminal Court, British lawyer Karim Khan KC, and took close to three years to complete. In May 2021, this U.N. body concluded that there is “clear and convincing evidence that genocide was committed by ISIL against the Yazidi as a religious group” and that “the intent of ISIL to destroy the Yazidi, physically and biologically, is manifest in its ultimatum—applied remorselessly to all members of their community—to convert or die.” UNITAD established that in 2014 “[t]housands were killed pursuant to this ultimatum, either executed en masse, shot as they fled, or dying from exposure on Mount Sinjar” in 2014. And it has confirmed that “thousands more were enslaved, with women and children abducted from their families and subjected to the most brutal abuses, including serial rape and other forms of unendurable sexual violence” with the intent to “permanently destroy the capacity of [Yazidi] women . . . to have children and build families within the Yazidi community.” Furthermore, UNITAD established that “numerous other international crimes were also committed against the Yazidi community, including extermination,

enslavement, sexual violence, forcible transfer, persecution on religious and gender grounds, and conscription of children into an armed group.”

95. Prosecutions of ISIS members in national courts, including in Germany’s highest court, have also led to convictions of ISIS members of genocide against Yazidi victims, as well as crimes against humanity, war crimes, murder, and other offenses.

96. The German Federal Court of Justice, Germany’s highest court, has confirmed that the crimes constituted not only terrorism, war crimes, and crimes against humanity but also genocide. German courts convicted three ISIS members of genocide for their crimes against the Yazidis, finding that “[i]n order to achieve the complete destruction of the Yazidi religion and its members, ISIS fighters intentionally and systematically carried out a centrally planned, organized, and coordinated military attack against the members of the group [in] Sinjar.”<sup>50</sup> German courts have also convicted five other ISIS members of terrorism offenses, crimes against humanity, and war crimes for their involvement in ISIS’s crimes against the Yazidis.

97. In France, where criminal proceedings against Lafarge and its executives are pending, the French Supreme Court cleared the way for a criminal trial against Lafarge for complicity in crimes against humanity and financing of terrorism committed by ISIS and other armed groups in Syria. In a decision rendered in September 2021, the Criminal Chamber of the Supreme Court held that there was sufficient “serious and corroborating evidence,” including minutes of Lafarge’s weekly meetings, showing that Lafarge had provided support to ISIS while having “precise knowledge” of the criminal nature of the terrorist group’s activities which were

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<sup>50</sup> Judgment of the Higher Regional Court (Oberlandesgericht) of Frankfurt am Main, Genocide to the detriment of the Yazidi religious group ¶ 62 (5th Criminal Chamber Nov. 30, 2021), <https://www.eurojust.europa.eu/document/higher-regional-court-frankfurt-am-main-germany-30-november-2021-case-number-5-3-ste-120-4>.

“likely to constitute crimes against humanity.”<sup>51</sup> The Supreme Court also found that “knowingly paying several million dollars to an organisation whose purpose was exclusively criminal suffices to constitute complicity” in the crimes committed by the criminal organization, regardless of whether the accomplice was pursuing a commercial activity.<sup>52</sup>

98. The Paris Court of Appeal—to which the case was then remanded—followed the Supreme Court’s assessment and in May 2022 confirmed the charges of complicity in crimes against humanity and other crimes against Lafarge. In its analysis, the Court highlighted that ISIS had committed crimes against humanity in Syria, including that it “has denied the right of the Yazidi to exist and justified their destruction according to a concerted plan.”<sup>53</sup> The Court of Appeal concluded that Lafarge not only bought raw materials from ISIS but also cited an internal investigation performed by LafargeHolcim that found that Lafarge had made payments amounting to \$15.5 million to local armed groups, including ISIS.<sup>54</sup> The Court found that “although informed that the actions of ISIS could constitute crimes against humanity, Lafarge, which could have put an end to the activities of LCS by asking it to close the plant, decided instead to continue this activity . . . even if it meant paying several million dollars to its groups.”<sup>55</sup> As such, the Court of Appeal concluded that “there is serious and corroborating evidence of [Lafarge’s] participation as

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<sup>51</sup> Judgment of the Court of Cassation, Criminal Chamber, Appeal No. 19-87.367 (Sept. 7, 2021), [https://www.courdecassation.fr/decision/6137092ff585960512dfe635?search\\_api\\_fulltext=lafarge&sort=&items\\_per\\_page=&judilibre\\_chambre=&judilibre\\_type=&judilibre\\_matiere=&judilibre\\_publication=&judilibre\\_solution=&op=&date\\_du=&date\\_au=](https://www.courdecassation.fr/decision/6137092ff585960512dfe635?search_api_fulltext=lafarge&sort=&items_per_page=&judilibre_chambre=&judilibre_type=&judilibre_matiere=&judilibre_publication=&judilibre_solution=&op=&date_du=&date_au=).

<sup>52</sup> *Id.*

<sup>53</sup> Amal Clooney, *Paris Court of Appeals Confirms Charges Against French Multinational Lafarge for Complicity in Crimes Against Humanity Committed by ISIS*, Doughty Street Chambers (May 23, 2022), <https://www.doughtystreet.co.uk/news/paris-court-appeal-confirms-charges-against-french-multinational-lafarge-complicity-crimes>.

<sup>54</sup> *Id.*

<sup>55</sup> *Id.*

an accomplice in these crimes against humanity” because by financing ISIS, the company had knowingly assisted and facilitated the group’s crimes.<sup>56</sup>

**a. Yazidis Are An Ethnic And Religious Minority In Northern Iraq**

99. Yazidis are an ancient ethnic and religious minority group that is principally Kurdish-speaking, and neither Muslim nor Christian. Before 2014, the Yazidis primarily lived in Sinjar, an area consisting of around 50 villages around the base of Sinjar Mountain, in the border region of northwestern Iraq and northeastern Syria. An estimated half a million Yazidi people lived in this region and many made a living by farming or shepherding sheep and goats. Yazidi families are typically large and tight knit. Families lived in the same house even as their children grew up and started families of their own. Extended families usually lived on the same street and often in joint compounds, sharing meals, resources, and income.

100. Yazidis are part of a small religious group. Its followers believe in one God whose power on Earth is delegated to seven angels. The seven angels are led by Malek Taūs, an angel who fell to earth and transformed into a peacock, and who serves as the intermediary between God and the Yazidis. Many Yazidis decorate their homes, shrines, and graves with images of peacocks and other memorials of important religious figures.

101. ISIS’s theological authorities studied the Yazidis and how they should be treated under ISIS’s ideology, and decided Yazidis were “*mushrik*,” *i.e.*, pagan or polytheist, judged not to believe in God as worshipped by “*Ahl Al-Kitab*,” or the People of the Book. As a consequence, unlike Jews and Christians, Yazidis were not given the choice to convert or pay a tax and leave when ISIS invaded, but instead were killed or enslaved.

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<sup>56</sup> *Id.*

102. ISIS's official English-language magazine, *Dabiq*, called the Yazidis "devil worshippers" because:

[t]he Yazidis['] present-day creed . . . entails the worship of Iblīs who they consider to be a fallen but forgiven angel amongst the angels who were ordered to prostrate to Ādam! He alone refused to prostrate to Ādam, and they consider this arrogant disobedience of Allah to be his noblest deed! . . . So they have made Iblīs who is the biggest tāghūt—the symbolic head of enlightenment and piety! What arrogant kufr can be greater than this? . . . It is ultimately ironic that Obama sites [sic] these devil worshippers as the main cause for his intervention in Iraq and Sham. . . .

ISIS singled out the Yazidis as the group they wished to destroy, openly proclaiming in their official documents that "Muslims should question [their existence] as they will be asked about it on Judgment Day."

**b. ISIS Invades Sinjar**

103. The Yazidi summer festival of *Çileyā Havînê* falls on August 2 annually. It marks the fortieth day of summer. Observant men fast for forty days before the holiday, and worshippers visit Lalish Temple in Sheikhan, near Sinjar, and dozens of temples in Sinjar to worship and celebrate. Families and friends visit, bringing cookies and candy, and drink coffee and tea together. The mid-day meal is followed by a party with drinks or a barbecue on Sinjar Mountain.

104. This festive scene turned into a nightmare in the early hours of August 3, 2014. At 2:30 in the morning, ISIS fighters advanced towards Sinjar. They came in armored jeeps and in the back of pickup trucks, carrying automatic weapons, pistols, and knives. As they arrived, Yazidi families' cell phones began ringing in quick succession. Family and friends warned each other that ISIS was coming. As civilians with no one to protect them, they had only one option: try to escape. They began to frantically coordinate who had a car with empty seats or a trunk.

105. Desperate to escape, grandparents, aunts, uncles, and cousins piled into small vehicles, on top of one another, on laps, wedged into the trunk, or hanging from the roof. Trucks

were crammed full of dozens of people, and families were separated as they rushed to escape. When someone fell off an overcrowded vehicle as ISIS members were chasing, drivers had to make the impossible decision of risking everyone's lives by stopping to help or leaving that person behind. Those who could not fit in a car ran on foot. With ISIS coming from the east and the west, there were few options for how to get out and where to go. ISIS fighters quickly went door-to-door looking for people who were hiding and set up checkpoints to prevent stragglers from escaping. Elders typically lived with their sons and daughters, but if there was no one strong enough to carry them, they had to be left behind. Countless elderly, sick, and disabled Yazidis who had to be left behind have never been found.

**c. ISIS Executes Men And The Elderly And Captures Children**

106. ISIS rounded up entire families and villages. ISIS members separated men and boys of fighting age from women, girls, and children. Men were given two options: convert or die. Those who refused to convert were shot, their corpses left to rot or thrown in mass graves. Men were often killed in front of their families, or families had to watch as the men were marched off in groups for mass executions. Survivors describe hearing the gunshots from these massacres.

107. Boys over the age of 10 or who had reached puberty were deemed too difficult to indoctrinate and were also executed. Witnesses describe seeing ISIS members inspect the boys' armpits; if they had hair, they were deemed mature enough to be executed with the men.

108. Over half of all the Yazidis who were executed were in fact children. The young boys who were kidnapped were forced to train as child soldiers in camps for ISIS's "Cubs of the Caliphate." They were indoctrinated by ISIS, taught that Yazidism was evil, given Islamic names, and were forced to study Islam and to speak Arabic so that they would forget their mother tongue,



religion, and culture.<sup>57</sup> They were taught about ISIS's so-called "jihad" and the importance of joining ISIS's fight against non-believers, including their own community. Many boys were subject to physical beatings as part of their training and were forced to watch ISIS propaganda videos of armed battles, beheadings, and suicide missions. Some were forced into violence against their brothers, or others. And they were ultimately sent to fight for ISIS on the front lines, where they were used as human shields. Many are still missing today.

109. Sinjar was under siege for almost two weeks, until August 15, 2014. In Kocho, one of the Yazidi villages, ISIS forced the surviving residents at gunpoint to gather at the local school. Women, girls, and younger boys were held on the upper floor of the two-story building, while men and older boys were confined on the ground floor. ISIS stripped them of their phones, car keys, money, and any other valuables. ISIS forced over 400 men and older boys who refused to convert to Islam onto pickup trucks and drove them to various points around the village where a bulldozer had dug holes in the ground. They shot them all and threw them into mass graves. Older women were taken to another location, where they were also shot and buried. Eighteen mass graves have been found in Kocho so far, and over eighty in all of Sinjar.

110. What happened to plaintiff Ismael Maajo's family is typical of the Yazidi experience. He was in Turkey during the midsummer holiday when ISIS came to Sinjar, where he and his family lived. He learned over the phone that his parents and siblings had fled to his uncle's house, where neighbors convinced the family to stay and put a white flag over their door for safety. An hour later, ISIS arrived. But the white flag did not keep them safe. The men in the home—Ismael's father, three of his brothers, his half-brother, and a nephew—were lined up outside the home and shot. One of his brothers survived the shooting and hid under the bodies of his family.

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<sup>57</sup> Yazidis' native language is Kurmanji.

He crawled out and escaped to the mountains during the night. ISIS shoved the others into a makeshift shallow grave. In total, thirty-two members of Ismael's family were kidnapped. Nine are still missing, including his mother and siblings. Ismael himself left Turkey and met the remaining members of his extended family who were able to escape from ISIS to Sinjar Mountain, and from there to Dohuk in Kurdistan, where they lived in an abandoned house.

**d. ISIS Enslaves Yazidi Women And Children**

111. ISIS captured Yazidi young women and girls and made them available to its fighters and members for sexual abuse at a scale unlike anything witnessed in modern times. Unmarried women and girls as young as nine were taken to processing centers, where they were registered and photographed. ISIS fighters examined the girls, sometimes asking them to show their bodies and teeth, examining, touching, and commenting on them and then selecting the ones they wished to purchase as slaves.

112. Many Yazidi women and girls were sold in "*souk sabaya*," (slave markets), which were organized and operated by a central Committee for Buying and Selling of Slaves, while others were sold on online messaging applications such as Telegram. The price for a Yazidi woman or girl started at U.S. \$200 and depended on factors such as virginity, age, and perceived beauty.

113. The trade in girls as slaves was highly regulated. Many of the women were brought from Iraq to Syria, specifically Raqqa, near the Cement Plant. There were two now-infamous holding sites in Raqqa. One was a building referred to as "the farm" by ISIS members, where women were separated from one another and auctioned off to fighters. The other was an underground prison or security base composed of three fly-infested rooms with overflowing toilets where hundreds of other women and children were crammed in. Survivors were directly taken from buses to underground rooms. Some survivors describe that the prison was still under construction, with several floors unfinished; some saw ISIS members bring cement and blocks.

The rooms were too crowded to lie down. They were given two “meals” per day—one slice of bread and a ration of cheese to share between two people for breakfast, and plain rice for dinner. Water was dirty and scarce and sometimes mixed with gasoline. Some Yazidi survivors described sometimes feeling dizzy after ingesting food or water and believed ISIS members were drugging them.

114. Shortly after the attack on Sinjar, many slaves were first sold directly out of these group holding sites, where ISIS fighters were able to select and take individuals either because of their seniority, as a reward for their work, as a substitute for their salary, or in exchange for payment. Some slaves were also sold through physical slave markets and others via online auctions. Later, Yazidi women were also sold or exchanged privately. Raqqa soon became the center of a “thriving trade” in Yazidi women and girls, who were raped, beaten, and moved, often at regular intervals due to changes of “ownership.”<sup>58</sup>

115. Once a Yazidi woman or girl was purchased, the purchasing ISIS member could resell, gift, or will her to other ISIS members. While in captivity, ISIS members subjected Yazidi women and girls to beatings, verbal abuse, and forced domestic labor, and made them perform Islamic prayers, memorize and recite the Quran, and fast during Ramadan. ISIS fighters raped the women regularly, sometimes in groups, knowing that for Yazidis sexual intercourse with a non-Yazidi meant expulsion from their religious community. They denied victims access to adequate

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<sup>58</sup> “The slaves were first sold directly out of the group accommodation, where IS fighters were able to select and take individuals either because of their prominent role, as an award for ‘outstanding performance’, as a substitute for their salary or in exchange for payment, or through central slave markets and sometimes via online auctions. Later on, Yazidi women were also sold privately . . . A thriving trade in Yazidi women and girls developed in Raqqa. in particular, even shortly after the attack on the Sinjar region. Rapes, beatings and frequent changes in location within a short period of time due to the change of ownership were commonplace.” Judgment of the Higher Regional Court (Oberlandesgericht) of Frankfurt am Main, Genocide to the detriment of the Yazidi religious group ¶ 62 (5th Criminal Chamber Nov. 30, 2021), <https://www.eurojust.europa.eu/document/higher-regional-court-frankfurt-am-main-germany-30-november-2021-case-number-5-3-ste-120-4>.

food and medicine. They met victims' attempts to resist with the threat or perpetration of gang rape and beatings. Some women were forced to bear their rapists' children and were then sold, gifted, or bequeathed to other members of the caliphate. Many wives of ISIS fighters were also active torturers, forcing Yazidi girls to wear Islamic clothing, pray, do housework, and put makeup on in preparation for rape by their husband or other ISIS fighters who came to their home. Plaintiffs such as Nadia Murad, Suad Ket, Jane Doe, and Janet Doe illustrate the brutality that Yazidi women were subjected to.

116. Plaintiff and Nobel Peace Prize Laureate Nadia Murad<sup>59</sup> was 21 years old when ISIS attacked her village, Kocho, on August 3, 2014. ISIS separated men and boys from women. The men, including six of Nadia's brothers and eleven of her cousins, were marched away and executed. Nadia's mother was killed and thrown into a mass grave. Two of Nadia's young nephews were taken to Tal Afar for military training. The younger women and girls—including Nadia and her sisters, nieces, and sisters-in-law—were kidnapped.

117. They were loaded into buses and taken to ISIS's headquarters in Mosul where Nadia was held with hundreds of other Yazidis, beaten, spat on, and burned with cigarettes. ISIS militants would come to inspect them and take the girls they liked. An ISIS leader took Nadia and 60 other girls—some as young as ten—to a nearby location where they were offered to other ISIS militants. The jihadist who took Nadia began to physically abuse and rape her daily, and forced her to wear a face covering and perform Islamic prayers. As a punishment after a failed attempt to escape, Nadia was hit with a leather whip and raped by six soldiers for hours until she fainted. Nadia was then taken to several different locations where she was again sexually abused—ultimately by twelve different ISIS men. She ultimately escaped when her new "owner" left a door unlocked

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<sup>59</sup> Official name Nadia Taha.

and she ran away one evening, eventually able—with the help of strangers—to cross the border to safety. UNITAD exhumed the remains of Nadia’s mother and identified two of her brothers along with other victims of the Kocho massacre. Nadia has since been able to bury her two brothers. Four of Nadia’s sisters and eleven of her sisters-in-law were able to escape from ISIS. But one sister-in-law, one of her nieces, and one nephew remain missing.

118. Plaintiffs Jane Doe and Janet Doe are sisters, and were teenagers when ISIS attacked Kocho.<sup>60</sup> Like Nadia, Jane Doe and Janet Doe were taken to ISIS’s headquarters in Mosul along with other young women, including some girls as young as nine, and were held with hundreds of other Yazidis for ISIS to inspect and choose who they liked. Jane Doe and Janet Doe’s stepmother and two young stepbrothers were also sold into ISIS captivity, and the younger stepbrothers were taken at times to train with ISIS fighters. The ISIS militants who took Jane Doe and Janet Doe physically and sexually abused them. As a punishment after a failed attempt to escape from their first captor, Jane Doe and Janet Doe were beaten for hours. Jane Doe was lashed with a whip until she bled profusely. The two ISIS members carrying out the beatings placed a chair on Janet Doe’s head and stomped on it. After their first captor died, Jane Doe and Janet Doe were sold to two different captors. They were only able to escape after being in captivity for approximately one year.

119. Years later, as the mass graves in Kocho started to be exhumed, Jane Doe and Janet Doe discovered that their father, grandfather and uncle had been executed in Kocho and their grandmother had been buried alive. Their stepmother and stepbrothers were eventually able to

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<sup>60</sup> Names withheld to protect plaintiffs.

escape from ISIS captivity, but in total Jane Doe and Janet Doe lost over 60 members of their family to ISIS's brutality.

120. Plaintiff Suad Ketî was pregnant when she was captured by ISIS in August 2014 and separated from her husband, who remains missing to this day. Along with other captured Yazidi women, Suad was first taken to Tel Afar, where she gave birth to her son. ISIS then moved her to several different locations before taking her to Raqqa – one of the key locations in ISIS's Yazidi slave trade. In Raqqa, she and other Yazidi women were lined up in a room so that ISIS members could choose which girl they wanted to buy. The ISIS member who bought Suad brutally tortured and raped her. When Suad tried to resist, her captor threatened to harm her baby, tied her up with ropes, or burnt her with a hot iron. Her captor also repeatedly slammed her head on the floor, and she frequently fell unconscious. When Suad's months-old baby would cry, her captor would cover the baby's mouth with his hands. Suad was sold to two other ISIS members before she was finally able to escape, after approximately one and a half years in ISIS captivity.

121. The systematic enslavement and sexual abuse of Yazidi women and girls was intended to destroy the group, including by limiting the capacity of women to procreate within the group. Yazidi women and girls were also told that they could not return to their communities after having lost their "honor," and that their situation in captivity was better than the rejection and certain death they would face from their families.

122. As early as August 12, 2014, there was widespread general knowledge that ISIS's brutality included kidnapping and selling women into sexual slavery. For example, the U.N. Special Rapporteur on violence against women, Rashida Manjoo, announced on August 12 that ISIS was assigning or selling women to ISIS as slaves, which she called a crime against humanity. An Iraqi government minister said the country had "striking evidence" of ISIS's crimes including

that hundreds of women were being killed and sold. The U.N. Special Representative of the Secretary-General on Sexual Violence in Conflict, Zainab Hawa Bangura, and the Special Representative of the Secretary-General for Iraq, Nickoly Mladenov, issued a joint statement on August 13 condemning the “atrocious accounts of abduction and detention of Yazidis” and describing “reports of savage rapes [that] are reaching us in an alarming manner.”

123. Over 6,000 Yazidi women and girls were ultimately captured by ISIS, the majority of whom were children. More than 2,700 are still missing today.

**e. ISIS Publicized Its Genocidal Views That The Yazidis Must Be Destroyed**

124. ISIS made no secret of its belief that Yazidis were to be eradicated. To the contrary, it published a series of official documents describing its intention to terrorize the Yazidi population and target them for murder, sexual slavery, and genocide.

125. ISIS viewed the destruction of Yazidis as a religious imperative. Articles published in ISIS’s English-language publication, *Dabiq*, preached to “kill the *mushrikin* [polytheists] wherever you find them, and capture them, and besiege them.” ISIS preached the hateful concept that Muslims had to question the continued existence of Yazidis as an ethnic group and religion because they would have to answer for it on Judgment Day. The killing of Yazidi men was deemed a religious obligation of ISIS members. Of the religious minorities ISIS terrorized, ISIS gave its followers specific permission only to systematically enslave and rape Yazidi women. Kayla Mueller was an exception because she was American—and as a result she was brutalized by the leader of ISIS himself, Abu Bakr Al-Baghdadi.

126. In an article entitled “The Revival of Slavery before the Hour,” published in October 2014 in ISIS’s magazine *Dabiq*, ISIS differentiated the Yazidis from other non-Muslims, stating that:

Prior to the taking of Sinjar, [religious] students in the Islamic State were tasked to research the Yazidis . . . Unlike the Jews and Christians, there was no room for [taxes for non-Muslims] payment. Also, their women could be enslaved unlike female apostates who . . . can only be given an ultimatum to repent or face the sword.

127. ISIS's publicly declared ideology not only expressly permitted sexual abuse of Yazidi women and girls, but explicitly encouraged and regulated it. In 2015, ISIS's Research and Fatwa Committee distributed a 15-page pamphlet entitled "From the Creator's Maxims on Captivity and Slavery," which analyzed the religious justification for enslaving infidels in accordance with ISIS's interpretation of Islam and explicitly excluded Christian and Jews. The pamphlet stated that "[t]here is no doubt that the captivity and enslavement of the women of the disbelievers at war and their offspring are among the greatest forms of the honour of Islam and its *Shari'a*" and praised the captivity and enslavement as means of increasing the offspring of the Muslims as "slave girls may give birth." Another publication from the Research and Fatwa Committee, titled "Questions and Answers on Taking Captives," provided guidance to ISIS slave-owners. The pamphlet stated that it is permissible to take a female captive and have forced intercourse with her. It allowed the physical punishment of female captives as a "form of discipline," stated that a girl can be raped before she has reached puberty, and permitted the swapping or selling of girls on the basis that they are merely "property."

128. It was this warped view that Yazidis were lesser humans that could and should be killed, bought, sold, and abused that spurred ISIS to unleash unimaginable brutality on the community in early August 2014.

**f. Some Yazidis Escape To Kurdistan**

129. When ISIS invaded Sinjar on August 3, 2014, Yazidis who managed to survive ISIS's initial advance fled desperately to protect themselves and their loved ones. Those who lived in areas further away from the ISIS frontline and had enough warning, raced ahead of the ISIS



fighters towards Kurdistan, the northern region of Iraq. The roads were packed with Yazidis trying to avoid ISIS's gunfire, checkpoints, and collaborators. Families rode in whichever vehicle had space for them, and when cars broke down from the weight of the bodies jammed inside, the younger men would get out to push.

130. Kurdistan was ill-prepared for the influx of Yazidis, and the towns rapidly filled with hundreds of thousands of fleeing refugees. Initially, many slept in half-constructed buildings that had partial walls and no roofs. Entire families slept by the side of the road or piled together in school buildings that were empty for the summer.

131. Plaintiffs Basima Kurtan and her husband Ahmad Mastto lived in a large town near Sinjar Mountain with their children. Basima woke up early on August 3 and began preparing breakfast for the family, as she did every day. She noticed that the roads were full of people shouting and running. She called the neighbors to ask what was happening. They told her that ISIS was there and that she had to leave immediately. Basima and Ahmad, along with their four children and their extended family, piled into a car and began driving toward Sinjar Mountain to escape. They had no time to gather any belongings. A relative called and warned them not to go to the mountain, but to go to Kurdistan instead. They turned the car around, into a firefight between Kurdish fighters and ISIS. Basima and her daughter still have nightmares about escaping, remembering the bullets that whistled past the car. With the help of an extra liter of gas stashed in the car, the family made it to Kurdistan. They slept in fields for two nights, until locals moved them to an unfinished building. They stayed there for five months, until the entire family moved to a camp for internally displaced people, where they remained for almost two years.

**g. ISIS Traps Thousands Of Yazidis On Sinjar Mountain**

132. Many Yazidis, however, did not make it to Kurdistan. Instead, they had only one option: drive or run to Sinjar Mountain, an arid area with daytime temperatures approaching 120 degrees Fahrenheit in the summer.

133. As many as 50,000 Yazidis scrambled up the mountain to escape. ISIS chased them as they fled, snipers shooting everyone they could reach. Some survived, but many were killed on the way up or once they got there, with their bodies left on the road. ISIS killed the men they caught and captured women and children. Some who could not run fast enough flung themselves off the mountain ledges, and some women took their own lives, preferring to die than to be captured. One of Plaintiff Laila Khoudeida's cousins died by suicide by setting herself on fire while on Sinjar Mountain.

134. The Yazidis were trapped on the mountain with ISIS completely surrounding them for approximately one week, though some were forced to stay longer. They had no food and no water. The days were extremely hot, and the nights freezing cold. Babies died first of dehydration. Grandparents who had been carried up the mountain fell ill or died as the extreme temperatures continued. Some pregnant women lost their babies and struggled to keep themselves alive. Plaintiffs Darweesh Qasim and Kori Omar's two-month-old baby died on Sinjar Mountain. Many Yazidis who had been shot during the escape succumbed to their injuries. Older children and adults ate grass and leaves from small shrubs.

135. Plaintiff Khidhir Ido and his wife lived in Khana Sor, a large town in Sinjar, with their six-month-old baby girl. On August 3, 2014, Khidhir and his wife were separated, as they were celebrating Çileyâ Havînê with their respective families. Suddenly, he started hearing word that ISIS was coming to Khana Sor. He, his parents, and his siblings fled to Sinjar Mountain in his father's car. Through the car window, Khidhir saw ISIS killing members of his village along

the way. His wife fled to the mountain separately with their baby daughter. Two hours after Khidhir arrived on the mountain he called his wife, but was unable to reunite with her. Through her tears, Khidhir's wife told him that there was no food, milk, or water for their child. With nowhere to charge their phones and no service, Khidhir was not able to communicate with his wife for the rest of their time trapped on the mountain. He believed that she and their daughter had been captured. He spent those seven days without food, water, or shade, but thought only of his wife and baby. He was finally able to connect with his wife after those seven days, when his wife found a phone to borrow. Khidhir's wife told him that people had told her to abandon their baby, but she refused to let go of her until they reached Kurdistan. Khidhir finally reunited with his family in Kurdistan, where he saw that his daughter had suffered severe burn marks from the heat of the mountain. He took his daughter to a Kurdish hospital for treatment, but she still has scarring from these burns today.

#### **h. The Yazidi Atrocity Garners Immediate International Attention**

136. Images of this human tragedy were beamed around the world in real-time. On August 3, 2014—the day ISIS invaded—Agence France Presse English reported that “the Yazidi minority faces a struggle for survival in Iraq” in the face of “Islamic State jihadists” taking over their territory. The U.N. representative in Iraq declared a “humanitarian tragedy in Sinjar,” noting that over 200,000 people had been forced to flee.

137. That same day, the New York Times reported that “Sunni extremists” had captured three towns, including Sinjar City, and “set about their method of conquest, which is as familiar as it is brutal. They destroyed a Shiite shrine, executed resisters, overran local security forces and hoisted the black flag of the Islamic State in Iraq and Syria,” demanding that residents “swear

allegiance to ISIS or be killed.”<sup>61</sup> Newspapers reported kidnappings and executions of Yazidis in the following days. ISIS itself posted pictures of its fighters patrolling Sinjar’s streets on social media.

138. Yazidis in the United States watched in horror as their villages were destroyed and their families fled for their lives. Desperate for international support, they protested in their hometowns, including in Lincoln, Nebraska and Austin, Texas. Some drove overnight to Washington, D.C., where they held a sit-in outside the White House. They held meetings with President Obama’s senior advisors and at the State Department, begging the United States to intervene to help save their community.

139. On August 7, 2014, President Obama authorized aid drops of water and food for those trapped on the mountain. That same day, U.S. aircrafts dropped 5,300 gallons of fresh water and 8,000 meals on the mountain. President Obama also announced that he had authorized airstrikes against ISIS to try to prevent a “massacre.” American planes struck ISIS locations in nearby towns. Even at this early stage, Obama called the Yazidis’ expulsion and entrapment on the mountain a “potential act of genocide.”

140. By August 14, 2014, American airstrikes had cleared enough of a path on the mountain that many Yazidis were able to escape, guided by the local Kurdish militias. Those who survived walked or hitched rides across the Syrian border and traveled to Kurdistan, finding partially constructed buildings, empty schools, or open fields to stay in.

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<sup>61</sup> Tim Arango, *Sunni Extremists in Iraq Seize 3 Towns From Kurds and Threaten Major Dam*, N.Y. Times (Aug. 3, 2014), <https://www.nytimes.com/2014/08/04/world/middleeast/iraq.html>.

141. This nightmare, which began on August 3, 2014, took place a year after Lafarge started to pay ISIS and ANF, according to Lafarge's own admission, and coincided with Lafarge's biggest deal yet with ISIS itself.

**i. Yazidi Lives Remain Uprooted**

142. No Yazidi family was left untouched by the atrocities perpetrated by ISIS. In August 2014—as Lafarge and ISIS finalized the terms of their revenue-sharing agreement—ISIS killed more than 5,000 Yazidis. ISIS kidnapped over 6,000 others, with the women sold as sex slaves and the boys used as child soldiers. According to available data, at least 2,700 remain missing.

143. More than a dozen internally displaced person camps in Kurdistan currently house about 200,000 Yazidis, who have now been there for almost a decade. Families—including many relatives of Plaintiffs—live in tents, and children born in the nine years since the genocide have known no home other than these tents. Fires frequently break out due to the camp stoves used for cooking, causing more deaths. Children languish without proper education opportunities. Those who fled ISIS, including women who escaped ISIS captivity, continue to suffer from the psychological trauma of what happened to them and lack access to appropriate psychological care, making suicides an unfortunate reality.

144. Yazidis stay in these internally displaced camps because, although almost a decade has passed since the genocide, they still cannot return home. ISIS destroyed entire Yazidi villages and towns and demolished dozens of Yazidi temples and shrines. Homes were destroyed by bombs, and farms and orchards were burned to the ground. Expensive water pumps, necessary for farming, were carted off to turn into rocket launchers or to sell. Stores were gutted. Homes were looted of appliances and furniture, and the houses that were not

bombed to the ground were stripped of their doors and windows. Yazidis, who typically keep their wealth in gold and money in their homes, lost everything.

145. ISIS's attack on Sinjar and other Yazidi areas in Iraq had catastrophic consequences for the lives of thousands of Yazidis, and families will continue to feel those consequences for years and generations to come.

### **III. DEFENDANTS PARTNER WITH TERRORISTS**

146. Before, during, and after the time ISIS was carrying out these brutal attacks on the Yazidis, Defendants were paying and conspiring with ISIS.

147. In 2007, Lafarge purchased the Cement Plant as part of a deal with Egyptian cement multinational Orascom Cement. In 2010, Lafarge and LCS completed the construction of the Cement Plant at a cost of \$680 million. When the Cement Plant finally opened for business in May 2010, Lafarge's CEO Bruno Lafont toured the facility with reporters and the French Ambassador to Syria. Shortly thereafter, the plant began producing 160 truckloads of cement a day, amounting to half a million dollars' worth of daily sales.

148. At the beginning of LCS's operations, it faced strong competition from cheaper cement imported into northern Syria from Turkey. To address this issue, in December 2010, Pescheux (LCS's CEO) requested that then-minority shareholder Tlass, a Syrian citizen with close connections to the Syrian regime and local groups, intervene with the Syrian government to curtail imports of competing Turkish cement.<sup>62</sup>

149. Less than a year later, however, the Cement Plant faced a more existential threat: the civil protests in Syria had erupted into a full-fledged civil war. In response to this crisis, in September 2011, the European Union barred its member states from buying, importing, and/or

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<sup>62</sup> SOF ¶ 21.

transporting oil and other petroleum products from Syria and from engaging in financial or insurance services for such transactions. The United States forbade import of its products into Syria, embargoed Syrian oil, and froze the assets of several Syrian individuals. In December 2011, the U.N. Office of the High Commissioner for Human Rights declared that Syria was in a state of civil war.

150. As the civil war continued, ISIS and ANF gained control over large swaths of Syria and committed brutal terrorist acts. As expected, the danger of operating in an active warzone, combined with the actions of the European Union, the United Nations, and the United States, prompted a mass exodus of multinational corporations from Syria. For example, in December 2011, two of the largest oil companies in the world—Royal Dutch Shell and Total—announced that they were leaving Syria.<sup>63</sup>

151. Defendants, by contrast, saw an opportunity in partnering with the terrorists. Even though armed conflict had spread to the area immediately surrounding the Cement Plant, at the specific direction of Lafarge and LCS's highest management levels, including the CEOs of both Lafarge and LCS, the companies doubled down on their \$680 million investment. Instead of ending their operations in Syria, they joined forces with the terrorists around them, enabling the terrorists to maintain and expand their control.

152. Pescheux (LCS's CEO) described the plan to Herrault (Lafarge's Executive Vice President of Operations) as follows:

[p]reserving the integrity of our physical assets (avoiding the plant to be looted), keeping our personnel ready for the end of the crisis (knowing the huge investment we have made in terms of recruitment and competency development), staying in the market (to keep our distributors' network and to prevent to let Turkish imports flooding

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<sup>63</sup> SOF ¶ 24.

North and East of Syria), making some profit to at least repay the interests of the loan and giving some assurance to the lenders.<sup>64</sup>

153. Lafarge and LCS have admitted that, starting in the summer of 2012, they forged ahead with their plan to make financial payments to various terrorist groups.

154. On September 23, 2012, Veillard and Tlass met in Gaziantep, Turkey with representatives of armed militants in areas surrounding the Cement Plant. Tlass recommended that LCS make payments to each of the armed militias based on the quantity of cement produced or according to a monthly fee.<sup>65</sup>

155. By November 2012, Lafarge and LCS executives had approved a plan to establish relations with ANF, another Al-Qaeda offshoot, through Tlass. On November 11, 2012, Tlass notified Pescheux that LCS was engaging directly with ANF: “gazi entab [Gaziantep, Turkey] was good we hav now conextion with jabhat al nosra [ANF].”<sup>66</sup>

156. The situation became more critical in 2013. By March 2013, armed groups had taken over the area around Raqqa and quickly established checkpoints at access roads to the Cement Plant.<sup>67</sup>

157. On April 7, 2013, Tlass recommended that LCS executives negotiate a new agreement to pay terrorist groups monthly or by the truckload to ensure continued sales and access to the plant.<sup>68</sup>

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<sup>64</sup> SOF ¶ 28.

<sup>65</sup> SOF ¶ 26.

<sup>66</sup> SOF ¶ 27.

<sup>67</sup> SOF ¶ 29.

<sup>68</sup> SOF ¶ 29.



158. Several months later, on August 30, 2013, Pescheux reported to Veillard (Lafarge Vice President of Security) and Herrault: “It is clear that we have an issue with ISIS and Al Nusra and we have asked our partner [Tlass] to work on it.”<sup>69</sup>

159. Lafarge and LCS executives were fully aware at the time that they were dealing with terrorist organizations.

160. For example, in a December 10, 2012 email, Veillard wrote: “The Islamist group Jabhat Al-Nusra, which is on USA’s list of terrorist organisations, has reportedly recruited several Norwegian citizens to fight in Syria.”<sup>70</sup>

161. Similarly, in a March 1, 2013 email, LCS’s risk manager warned Pescheux that ANF “follow[s] a global jihadi ideology (similar to al-Qaida),” “are more open to receive foreign fighters,” and had “ties to al-Qaida, exemplified by participating al-Qaida veterans” and the fact that “some of their statements are quickly published in the main al-Qaida news outlet.”<sup>71</sup>

162. Likewise, notes from a September 11, 2013 meeting of Lafarge’s Security Committee, which Veillard and Herrault received, stated: “It gets harder and harder to operate without having to directly or indirectly negotiate with networks classified as terrorists by international organizations and the U.S. The main challenge being to assess how far their demands and threats will reach, and consequently, the limits that we want to impose for the site to operate.”<sup>72</sup>

163. Despite this knowledge, Defendants decided to dispense with any limits and instead to conspire with the terrorists and facilitate their crimes.

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<sup>69</sup> SOF ¶ 30.

<sup>70</sup> SOF ¶ 27.

<sup>71</sup> SOF ¶ 27.

<sup>72</sup> SOF ¶ 31.

#### **IV. DEFENDANTS SUPPORT ISIS BY MAKING PAYMENTS AND SUPPLYING MATERIALS BEFORE, DURING, AND AFTER THE ATTACKS ON YAZIDIS**

164. Defendants proceeded to make millions of dollars in payments and provide key materials to ISIS, even as the group's terror campaign reached its peak. Lafarge and LCS have admitted that they began making payments to ISIS's predecessor groups in July 2012, and payments directly to ISIS itself when ISIS entered the territory near the Cement Plant in 2013.<sup>73</sup> Lafarge and LCS have admitted to providing almost \$10 million of value in funds and cement to ISIS and ANF from August 2013 to October 2014, and of this at least \$7.21 million was directly to ISIS and ISIS-controlled entities. *See supra* ¶¶ 4–5. But the actual amount of funding that Defendants gave to armed groups is believed to be at least \$15.5 million,<sup>74</sup> even excluding the value of the cement Defendants left for ISIS.

165. Lafarge provided support to ISIS primarily through six mechanisms:

- (a) monthly fixed-rate payments;
- (b) a flat fee payment per cement truck travelling back and forth from the Cement Plant;
- (c) “bonus” payments based on the amount of cement sold;
- (d) payments to ISIS-controlled suppliers for raw materials LCS used to make cement;
- (e) benefits and payments based on a long-term revenue-sharing agreement; and
- (f) selling and leaving behind cement and raw materials for ISIS to use in its operations.

These payments to ISIS violated 18 U.S.C. § 2339B, the United Kingdom Terrorism Act, § 15 (2000), European Union Council Framework Decision 2002/475/JHA (2002), and French Criminal Code Article 421-2-2 (2001).

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<sup>73</sup> SOF ¶ 27.

<sup>74</sup> Clooney, *supra* note 53.

**a. LCS Makes Fixed Monthly “Donations” To Terrorists**

166. As early as July 2012, when armed groups started taking over territory around the Cement Plant, LCS began making fixed monthly payments or “donations” to armed groups to ensure that the plant could continue to operate.<sup>75</sup> By November 2013, Lafarge and LCS executives explicitly confirmed that these donations were being made directly to ISIS. Ultimately, according to Lafarge and LCS’s plea, these payments exceeded \$816,000 in monthly “donations” to ISIS and ANF.<sup>76</sup> Of this, approximately \$585,000 went directly to ISIS. *See supra* ¶¶ 4–5.

167. These monthly donations were facilitated by Tlass, who acted as an intermediary between Defendants and the various armed groups in the area, including ISIS.<sup>77</sup> From July 2012, Tlass was receiving between \$80,000 and \$100,00 per month to distribute to these groups.

168. By February 2013, at Pescheux’s request, Tlass had begun periodically providing lists identifying the armed groups to which he was making payments on Defendants’ behalf and the amounts he was paying to the groups each month. For instance, Tlass advised Pescheux that he was making monthly payments of 200,000 Syrian pounds at first, and later 325,000 Syrian pounds per month to a group he identified as the “ALRAQA People,” a reference to ANF.<sup>78</sup> And the amounts kept increasing.<sup>79</sup> In a July 2, 2013 email with the subject line “Donations,” Pescheux calculated that the new total of monthly payments to armed factions was 17.4 million Syrian pounds (\$155,000 USD) per month.<sup>80</sup>

169. In an August 5, 2013 email with the subject line “Update on donations,” Pescheux wrote to Herrault about “some elements on the donations we are paying to [Tlass] and that he is

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<sup>75</sup> SOF ¶¶ 37-38.

<sup>76</sup> SOF ¶ 44.

<sup>77</sup> SOF ¶ 38.

<sup>78</sup> SOF ¶ 38.

<sup>79</sup> SOF ¶ 38.

<sup>80</sup> SOF ¶ 39.

supposed to channel to the various beneficiaries. As discussed in Dubai end of May and as reminded in my recent mail to you and [Roux], these donations are distinct from the monthly remuneration of our partner” Tlass.<sup>81</sup>

170. By at least November 2013, Lafarge and LCS executives explicitly confirmed that Tlass was making fixed monthly payments to ISIS. In a November 29, 2013 email, Lafarge and LCS executives exchanged a list of “donations we are paying to [Tlass] and that he is supposed to channel to the various beneficiaries.” The email contained a “List valid from November 1, 2013,” which included a monthly payment of five million Syrian pounds (\$38,000) for “Daesh (ISIS).” The list showed that the monthly donation payments to all armed groups now totaled 24 million Syrian pounds (\$174,000).<sup>82</sup>

171. On February 4, 2014, Pescheux directed Tlass to limit the monthly payments to armed groups to 20 million Syrian pounds, including limiting assessments on sales to 200 Syrian pounds per ton. Tlass responded that his representatives were meeting to discuss the payments with ISIS in Raqqa and with ANF in Aleppo.<sup>83</sup>

172. Following those meetings, Tlass advised LCS to increase payments to the terrorists. As Tlass explained in a March 31, 2014 email pointing out the extent of LCS’s investment and the amount of its current profit:

Is Lafarge able to bear a loss of about \$600 million, because we are operating in a difficult situation? . . . As long as we are selling and are able to overcome the obstacles, we should continue . . .

We currently sell for \$8 to \$10 million per month, with a \$2 million profit, and pay less than 1/4 for protection . . .

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<sup>81</sup> SOF ¶ 40.

<sup>82</sup> SOF ¶ 44.

<sup>83</sup> SOF ¶ 45.

[I]n this case we have to pay about 300million SYP [approximately \$2.7 million USD] monthly.<sup>84</sup>

173. Defendants’ monthly payments to terrorists allowed it to continue producing and selling cement at the Cement Plant into 2014, earning millions of dollars in profits each month for themselves—and for ISIS. These payments were not simply to ensure protection, as explained by Tlass in a March 31, 2014 email to LCS executives—“[o]ther factories are paying for protection just to exist, without making the profits we are.”<sup>85</sup>

174. On May 8, 2014, Tlass emailed LCS executives advising that LCS’s operations were not impeded by local armed groups, stating “Daesh—PYD—Al Nusra—Abu Issa<sup>86</sup> all we have good relations [with]. . . .”<sup>87</sup> Defendants maintained “good relations” with the terrorists by paying them ever-increasing amounts.

175. On September 15, 2014, LCS executives exchanged an email with Tlass’s initials as the subject line and containing two attachments. The first attachment was a document named “List of donations last version.pdf,” which listed a monthly payment of 10 million Syrian pounds (\$71,400) to “Daesh” [ISIS] as of May 1, 2014. This represented a doubling of the amount that had been negotiated just six months earlier. In a second attachment to the email, titled “Evolution of the security donations 2012-2013-2014,” Pescheux listed, on top of the total amount of LCS’s monthly “donation” payments, an additional “10 MSYP [million Syrian pounds] paid on April 23.”<sup>88</sup>

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<sup>84</sup> SOF ¶ 46.

<sup>85</sup> SOF ¶¶ 46, 47.

<sup>86</sup> “PYD” refers to the Democratic Union Party in Syria, an armed faction; “Abu Issa” refers to Liwa’ Thuwar Al-Raqqa, an armed militia participating in the Syrian civil war.

<sup>87</sup> SOF ¶ 47.

<sup>88</sup> SOF ¶ 47.

**b. Lafarge And LCS Pay Terrorists For Access To The Cement Plant**

176. As ISIS gained more territory, it began to establish armed checkpoints on roads leading to the Cement Plant.<sup>89</sup> By at least October 2013, Lafarge has admitted it was paying ISIS tolls.<sup>90</sup>

177. On August 26, 2013, Pescheux emailed Tlass a map of the area around the plant and summarized the “strong improvement . . . [o]n the west side of the plant towards Menbij, Al Bab, Aleppo, Idlib,” but highlighted that “[o]n the east side of the plant towards Hassakeh and Qamishli, [t]here are 2 check points held by jihadists (see the map) which are blocking the trucks to go to and from the plants,” and “[o]n the south of the plant, in the region of Al Thawra, Raqqah, Sokhna: there is a check point held by jihadists between Al Thawra and Raqqah and also potential problems at Sokhna.” Pescheux summarized the problem by stating “[g]enerally speaking, it is clear we have an issue with ISIS and Al Nusra in the east, especially in Raqqah.”<sup>91</sup>

178. The “issue” was not, in their eyes, ISIS’s crimes against humanity. It was ensuring access to and from the Cement Plant so that Defendants could continue their operations at all costs. Tlass responded “no probleme let me work on it today . . . i cal u tomorrow to breef you.” The next day Tlass emailed Pescheux, “We Negotiate with [ISIS] & AL NUSRA I got a News that the situation In the Plant is Very Good.”<sup>92</sup>

179. The situation was “Very Good” because, by October 2013, Lafarge began paying safe-passage money directly to ANF and ISIS, in violation of U.S., French, and international law. In early September 2013, Pescheux asked Tlass for updates regarding truck passage to the east of

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<sup>89</sup> SOF ¶ 29.

<sup>90</sup> SOF ¶ 35.

<sup>91</sup> SOF ¶ 43.

<sup>92</sup> SOF ¶ 43.

the plant, and the following month an LCS risk manager reported that “our customer has reached long term agreements with leading groups Islamic State in Iraq and al-Sham (ISIS) in Raqqa, the agreement let the trucks coming back and forth from the east side of the plant. Each cement truck has to pay 150\$.”<sup>93</sup>

180. Later, ISIS issued vehicle passes to LCS employees to “pass through after the required work. This is after they have fulfilled their dues to us.”<sup>94</sup> One such example of a vehicle pass, dated April 26, 2014, was issued on ISIS letterhead and sealed with an ISIS stamp.<sup>95</sup>

**c. LCS Pays Terrorists Based On Cement Sold**

181. Just one month after Lafarge and LCS began paying ISIS for vehicle access to the Cement Plant, they entered into a separate agreement with ISIS to effectively pay ISIS a “bonus” based on how well the Cement Plant was doing. Concluded on November 6, 2013 and written on ISIS letterhead, this agreement provided that ISIS would be rewarded with 400 Syrian pounds for each transported ton of cement from the Cement Plant. In exchange, ISIS would ensure the trucks access to the Cement Plant.<sup>96</sup>

182. LCS provided regular updates to ISIS with the details regarding the amount of cement sold to each of their customers, so that ISIS could ensure that they were receiving their full dues.<sup>97</sup> These payments complemented the monthly “donations” that Defendants were already paying to ISIS, in violation of U.S. and other laws.

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<sup>93</sup> SOF ¶ 35.

<sup>94</sup> SOF ¶ 36.

<sup>95</sup> SOF ¶ 36.

<sup>96</sup> SOF ¶ 36.

<sup>97</sup> SOF ¶ 34.

**d. LCS Purchases Raw Materials From ISIS-Controlled Suppliers**

183. In addition to making regular payments to terrorists, Defendants purchased materials from ISIS-controlled suppliers as part of their conspiracy with ISIS, making, by their own admission, payments to ISIS-controlled suppliers totaling at least \$3,447,528.<sup>98</sup> As ISIS expanded its control over northern Syria, it captured quarries of minerals LCS needed to continue to produce cement.<sup>99</sup> LCS agreed to purchase raw materials from ISIS-controlled enterprises who paid ISIS based on the amount of their sales to LCS. Defendants also purchased oil from ISIS-controlled suppliers.<sup>100</sup>

184. On November 6, 2013, for example, LCS and ISIS entered into a written agreement on ISIS letterhead providing that LCS would purchase pozzolana—a type of volcanic ash used to make blended cement—from ISIS for 1,300 Syrian pounds per ton.<sup>101</sup>

185. Lafarge conducted much of these negotiations for raw materials through intermediary Taleb, who had previously assisted LCS with environmental consulting. In late 2013, Taleb explained to LCS’s board that he wished to discuss “[t]he security issue of Lafarge . . . in Syria. I build up strong relationships with civilian and Military Locals including FSA, Kurds and Islamic state which are in control of all logistic path in and out of . . . Lafarge. . . .” Taleb repeatedly and explicitly identified ISIS as the seller of the raw materials that he brokered.<sup>102</sup>

186. For example, in a September 24, 2013 email about a recent order with the subject line “Urgent Fuel pozzolana Coal petcoke/Islamic state,” Taleb informed LCS executives that LCS had already agreed to accept pozzolana sold by ISIS and stated “FOR pozzolana 15000 tons ready

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<sup>98</sup> SOF ¶ 19.

<sup>99</sup> SOF ¶ 19.

<sup>100</sup> SOF ¶ 54.

<sup>101</sup> SOF ¶ 48.

<sup>102</sup> SOF ¶ 49.



to be shipped they are just waiting for signed P.O today max tomorrow please islamic state very sensitive about this issue.”<sup>103</sup>

187. In a separate email chain a few days later, Pescheux disputed the intermediary’s assertion that LCS had already agreed to purchase the materials, but nevertheless responded that “[a]fter my mail, our Purchasing team has contacted the contractor and the price is confirmed. We will place an order early next week for a limited quantity (probably around 5,000 tons) as we need to see how it will work. If it is OK we will increase the quantity.”<sup>104</sup>

188. As another example, in a September 28, 2013 email, Taleb declared, “I OFFICIALLY REPRESENT ISLAMIC STATE FOR INVESTMENTS and Soon for Kurdish. You ll get letter for that . So far im on LCS side but please Im asking kindly to have my Fees.”<sup>105</sup>

189. Defendants’ executives understood that transacting with ISIS in this manner was illegal.

190. In a December 7, 2013 email, Pescheux informed Herrault that the following activities likely violated Syrian government regulations: “Purchasing gypsum and pozzolana from rebellion,” “Purchasing Heavy Fuel Oil from rebellion,” and “Paying every month the various rebel entities.” Nonetheless, Pescheux determined that these activities were “needed for business continuity.”<sup>106</sup>

191. According to news reports, an internal investigation performed by PricewaterhouseCoopers found that Defendants paid intermediary Ahmed Jamal \$1,158,885 for

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<sup>103</sup> SOF ¶ 49.

<sup>104</sup> SOF ¶ 49.

<sup>105</sup> SOF ¶ 49.

<sup>106</sup> SOF ¶ 50.

supplies of pozzolana and heavy oil; Mohammad al Taweel Bn Ibrahim \$1,319,853 for pozzolana, and sixteen additional suppliers \$3,300,849 for other supplies.

192. So, with Defendants' blessing, intermediaries negotiated deals in which Defendants purchased raw materials that they used to operate the Cement Plant, including coal, fuel, sand, and pozzolana from ISIS-controlled entities.<sup>107</sup>

193. In early 2014, LCS agreed to purchase massive amounts of material from ISIS-controlled suppliers, including 100,000 tons of pozzolana at 1,650 Syrian pounds per ton; another 100,000 tons of pozzolana at 1,675 Syrian pounds per ton; 4,000 tons of heavy fuel oil at 39,000 Syrian pounds per ton; another 12,000 tons of heavy fuel oil at 26,500 Syrian pounds per ton; 15,000 tons of "dirt" fuel at 17,500 Syrian pounds per ton; and an option for 35,000 additional tons of dirt fuel at the same price, as well as yellow sand and coal. Pescheux reported these planned transactions to Defendants' executives and, on February 16, 2014, wrote to Herrault that the "situation with Daech (the jihadists of Islamic State in Iraq and Sham (ISIS)) is relatively calm and we are currently finalizing purchasing of pozzolana and fuel oil."<sup>108</sup>

**e. Lafarge And LCS Enter Into A Long-Term Revenue-Sharing Agreement With ISIS As Their Business Ties Deepen**

194. ISIS's violence and lawlessness also provided an opportunity to increase their footprint in the local cement market in a way that Defendants' executives had dreamed. Lafarge had previously lost sales to cheaper, competing cement imported from Turkey into Syria. ISIS's disregard for the law and its totalitarian control provided a chance for Lafarge to finally increase its standing in the market. If ISIS could block or tax cement imported from Turkey into Syria, LCS's revenue would go up, and so too would ISIS's share of the revenue. It is with this goal in

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<sup>107</sup> SOF ¶¶ 51, 52.

<sup>108</sup> SOF ¶ 54.

mind that, in 2014, Defendants set out to enter into a revenue-sharing agreement to incentivize ISIS to act in LCS's economic interest.<sup>109</sup>

195. Lafarge's top executives were aware of and approved Defendants' negotiations with ISIS. In July 2014, Tlass wrote in the course of a negotiation with ISIS in Dubai: "yesterday we started negotiations to reach a fix agreement with the ISIS and the highest authorities . . . I told them the final decision would come from Paris, neither from the factory nor from me."

196. Initially, Pescheux proposed that ISIS should "take a 'toll fee' on each truck loaded with Turkish cement." Such a toll would allow ISIS to gain revenue while simultaneously "reduc[ing] the attractiveness of Turkish cement. It would reinforce our competitiveness [and] therefore increase our volumes and increase the fees paid [to] our distributors or Da'ech [ISIS]."<sup>110</sup>

197. However, Lafarge and LCS executives were concerned that this toll would not prove enough of an incentive. According to a July 23, 2014 email that Herrault (Lafarge's Executive Vice President of Operations) wrote to Pescheux and Jolibois (LCS's outgoing and incoming CEOs), LCS's profit should be thought of as a "cake" that could be shared with ISIS:

We have to maintain the principle that we are ready to share the "cake," if there is a "cake." To me, the "cake" is anything that is a "profit", after the amortization and before financial expenses. Therefore, a tax by the ton is the only one that would make sense in this context. If we get a fixed tax, unless it's just a symbolic one, it would not make sense because they won't have a vested interest to have the plant run well.<sup>111</sup>

198. A July 14, 2014 Gmail message from Tlass to Pescheux discussed these "negotiations with ISIS," proposed providing ISIS with a "monthly statement," and sought input

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<sup>109</sup> SOF ¶ 73.

<sup>110</sup> SOF ¶ 69.

<sup>111</sup> SOF ¶ 73.

from Pescheux about how much Lafarge’s distributors should pay the terrorists “in addition to the ten millions that we pay directly to them, i.e. ISIS.”<sup>112</sup>

199. Negotiations continued throughout the summer, when ISIS invaded Sinjar, and into the fall of 2014. In August 2014, Tlass emailed Jolibois, LCS’s new CEO, to inform him that ISIS wanted another monthly fee in addition to an assessment on each ton of cement sold:

Negotiations with ISIS are complex and not easy at all. In their last request yesterday, they asked us to pay S.P.100 million/month, but I told them today morning that they will gain more than 100 million/month from the factory in case the agreement includes the fixed monthly amount + the introduction amount + the amount of our purchases of pozolana, sand and fuel.<sup>113</sup>

200. Jolibois responded: “If ISIS wants higher tax from us, it’s better for them to stop Turkish cement and Iraki cement, so that we may increase the price.” In response, Tlass said that ISIS was prepared to stop importation of Turkish cement if a revenue sharing agreement was concluded.<sup>114</sup>

201. On August 5, 2014, just two days after ISIS launched its widely-publicized attack on Yazidi villages and while thousands of Yazidis were trapped without water or food on Sinjar Mountain, Tlass sent Jolibois a draft of the proposed revenue-sharing agreement between LCS and ISIS.<sup>115</sup> The next day, Jolibois confirmed Lafarge’s and LCS’s agreement to share ten percent of Lafarge’s profits with the terrorist group, in return for ISIS’s agreement to take out the competition by stopping importation of Turkish cement in areas under its control or taxing those areas at a rate equivalent to or higher than the Cement Plant, as well as other benefits. As Jolibois put it:

As per our phone call today, hereafter what I understand from the agreement with ISIS, that I approve:

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<sup>112</sup> It is unclear from the face of the email to what currency the sender is referring.

<sup>113</sup> SOF ¶ 76.

<sup>114</sup> SOF ¶ 77.

<sup>115</sup> SOF ¶ 78.

- ISIS will receive the payment of 750SP/ton, by customers, every two weeks
- ISIS ensure the security and the free movement of our customers and suppliers vehicles as well as our employees
- ISIS will stop import of Turkish cement in the areas under its control (as of today: Al Rakka, Dair El Zor, Hasaka, Qamishli and Al Mayaden, Srin, Membij, Al-Bab, Deir Hafer and Maskaneh), or implement in those areas taxes as high or higher than to Jalabieyeh cement plant.
- The agreement is valid until February 5th, 2015.

I hope the agreement to be signed today, and sales to restart tomorrow.

ISIS needs to clarify which office (AlRaqqah or Membij) is certified to receive payments and deliver permission letters.<sup>116</sup>

202. The next day, as accounts of ISIS's barbarity in Sinjar dominated global headlines, Jolibois announced to Herrault:

I just finalized with Firas this morning:  
 ISIS 750 SP/ton, to be paid every 15 days by distributors; fixed portion to be reviewed (today 10M), but should not increase because it is against the Sharia Law; the distributors are ok and ready.

203. Despite agreeing to terms, ISIS continued to demand more concessions. On or about August 15, 2014, Tlass informed Jolibois that

Da'ysh [ISIS] have changed their mind and began to negotiate that they want 10% of the cement, and they want them as cement, in addition to that, they want 25% out of the value of our raw materials according to the bills . . .

They will take S.P1500 for each ton sold in their areas . . . And in addition, they take 15 millions monthly as charges of the pass of workers and raw materials. . . .<sup>117</sup>

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<sup>116</sup> SOF ¶ 79.

<sup>117</sup> SOF ¶ 81.

204. Even though ISIS had increased their demands, Lafarge was willing to comply, calculating their “operational margin” with the increased concessions ISIS wanted.<sup>118</sup>

205. Defendants ironed out a final revenue-sharing agreement with ISIS on or about August 20, 2014—after consulting with Lafarge’s in-house counsel.<sup>119</sup>

206. The executives involved in the negotiations with ISIS updated Lafarge’s Executive Committee during a meeting on August 27, 2014. The notes from the meeting reflect ISIS’s agreement to, instead of block Turkish cement, impose costs on Turkish cement that were equal to the costs imposed on LCS: “In our agreement with Daesh [ISIS], we said that in terms of taxation we must have the same treatment as Turkish imports.”<sup>120</sup> Thus, ISIS agreed to increase Defendants’ competitiveness in the local cement market.

207. Lafarge’s senior management also knew that Defendants’ partnership with ISIS was illegal under U.S. law and would have consequences in the United States. As Lafarge Chairman Bruno Lafont said: “we have to make sure that what we do is risk free (also vis-à-vis the U.S).”<sup>121</sup> In response, Herrault replied that “the best protection is to keep the plant in operation, sales have resumed, we are maintaining contact with everyone.”<sup>122</sup>

208. Lafarge had now solidified its shared objectives with ISIS. Each co-conspirator, including Defendants, intermediaries, and ISIS, would benefit from ISIS’s violent rise to power, which placed it in a position to control the local cement market to their mutual advantage.

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<sup>118</sup> SOF ¶ 76.

<sup>119</sup> SOF ¶ 85.

<sup>120</sup> SOF ¶ 86.

<sup>121</sup> SOF ¶ 86.

<sup>122</sup> SOF ¶ 86.

**f. Defendants Sold Cement To ISIS, And Left Cement And Explosive Material For ISIS To Seize**

209. Defendants did not hand only money to ISIS. They also sold ISIS cement—even before ISIS took over the Cement Plant. In a 2014 email to Jolibois, an LCS risk manager said ISIS was “looking for distributors in Syria like ours” for 150,000 tons of cement, and Defendants memorialized in an internal company note that ISIS was seeking such cement for its “personal consumption” rather than for “market.” News reports confirm that Lafarge and LCS agreed to ISIS’s request for cement: a former LCS employee also stated in an interview that when the terrorists “needed cement to build their tunnels and trenches,” an LCS “manager would give it to them.” And ultimately under the long-term revenue-sharing agreement, LCS agreed to give ISIS a fixed supply of cement in addition to a percentage of its revenues. *See supra* ¶¶ 200–01.

210. The same LCS employee suspected that there was “not a simple business relationship between a company offering cement and terrorist groups that needed money and cement for their defensive positions and tunnels.” Defendants “could do anything. They had deals with ISIS.”

211. A former French intelligence analyst also testified that Defendants sold cement to ISIS in Syria. This was reflected in periodic sales reports that an LCS sales manager sent to Pescheux, stating “it was not our problem that Daesh received our cement.” In words of a France-based legal expert and researcher, “ISIS needed primary resources provided by whatever actor. Lafarge was one of them.”

212. In addition to the supply of cement that LCS sold ISIS, when LCS evacuated the Cement Plant in September 2014, ISIS came into another windfall of cement, as well as explosive materials such as hydrazine that are used in the manufacture of cement.

213. On September 10, 2014, President Obama outlined a strategy for the United States to lead an international coalition to defeat ISIS. In the following days, ISIS advanced on the Cement Plant with an eye towards complete control of the region. Even in the face of this grave threat from ISIS, Lafarge and LCS executives wanted to continue with the conspiracy. Jolibois argued strenuously against shutting down the Cement Plant, saying that if LCS suspended operations “for the next few months until after the completion of the merger [with Holcim] we will surely be watched closely when we seek to resume them, and nothing says that the area will have been freed from the grip of ISIS, nor that it will be free from it for years.”<sup>123</sup>

214. Likewise, on September 12, 2014, Veillard sent an email to Herrault saying, “I think it’s imperative to maintain the plant in working order and to be able to restart quickly.” Veillard went on to say, “[i]t seems to me that this option is totally doable. . . .”<sup>124</sup>

215. The Lafarge and LCS executives’ desire to remain in the area despite ISIS’s control, coalition airstrikes, and danger to their employees meant that they did not implement a safe evacuation plan for their local staff nor take steps to prevent the plant’s operations and explosive raw materials from falling into terrorists’ hands. When ISIS informed employees early in the morning of September 18, 2014 that it intended to advance on the plant, Jolibois abandoned these locals to their fate, ordering them to “prepare mattresses, food, water, sugar” and to shelter in the plant’s electrical tunnels rather than evacuate. The employees eventually tried to flee by hitching rides with the fleeing canteen vendors and on local buses. But it was too late: ISIS kidnapped four employees during its advance.

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<sup>123</sup> SOF ¶ 92.

<sup>124</sup> SOF ¶ 93.



216. When they left, LCS employees left the plant entirely operational. All start-up technology and hard drives were left in place, and one diesel generator was still running. Lafarge could have shut down the plant's operating computers remotely, but chose not to.

217. ISIS completed its seizure of the Cement Plant on September 19, 2014, and promptly released propaganda videos showing its militants at the plant.<sup>125</sup>

218. In the Cement Plant, ISIS took what it wanted. ISIS seized the cement that LCS had produced in furtherance of the conspiracy, and ISIS ultimately sold that cement for what Lafarge and LCS's plea deal admitted was approximately \$3.21 million. The actual value of ISIS's seizure of the Cement Plant was much higher. According to publicly available French intelligence reports and media reports, the value of the Cement Plant at the time that ISIS seized it was approximately \$25 million.

219. As reported in the press and explained more fully below, *infra* Part VI(e), "With the supplied cement, [ISIS] reportedly constructed fortified shelters and tunnel networks against the U.S.-led coalition.

220. And ISIS seized raw materials at the Cement Plant, including hydrazine, a chemical that ISIS could use to produce explosives for terrorist attacks. Defendants' intermediary Taleb was present for some of the negotiations for the disposition of these remaining materials, which by December 2014 had already yielded approximately \$11.5 million. Thus, according to French intelligence, following October 2014, "the dismantling of the Lafarge plant in Syria continues to the financial benefit of both Daesh [ISIS] and the businessmen involved." In December 2014, Taleb visited Lafarge's headquarters in Paris to explain the ongoing negotiations relating to materials left at the plant.

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<sup>125</sup> SOF ¶ 95.

221. Of the five cement plants ISIS seized in its campaign in Iraq and Syria, Lafarge's Cement Plant was by far the largest—its production capacity was more than twice as much as that of ISIS's second largest plant.

**V. DEFENDANTS KNEW ISIS WAS A BRUTAL TERRORIST ORGANIZATION AND WORKED HARD TO CONCEAL THEIR PARTNERSHIP**

222. From the beginning of their relationship with ISIS, Defendants were aware that ISIS was a brutal terrorist group that had been designated as a foreign terrorist organization by the U.S. initially as part of Al-Qaeda and later under the name ISIS in 2014. And yet they knowingly entered into a partnership with ISIS. As ISIS's brutality deepened and the rest of the world recoiled from the horror of the attack on the Yazidis, Defendants deepened their conspiracy with a group whose sole purpose was criminal. Throughout the period that they supported ISIS, Defendants knew that their conduct was illegal, so they were careful to try to hide their partnership from ever coming to light.

**a. Defendants Partnered With ISIS Despite Its Brutality And Well-Publicized Attacks On The Yazidis**

223. ISIS was notorious for its brutality, and its crimes were well-publicized. From mid-2013, news reports began circulating describing ISIS's mass killings and hostage-taking.<sup>126</sup> In October 2013, Reuters described ISIS's involvement in mass killings of civilians.<sup>127</sup> That same month, the New York Times reported on ISIS's public executions, and described videos of armed fighters shooting "infidels" forced to kneel by the side of the road.<sup>128</sup> And the BBC described

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<sup>126</sup> See, e.g., *Syrian Rebels 'Executed' Alawite Villagers*, HRW Says, France24 (Nov. 10, 2013), <https://www.france24.com/en/20131011-syrian-rebels-executed-67-alawite-villagers-hrw-rights-watch>.

<sup>127</sup> Oliver Holmes, *Syrian Rebels Killed 190 Civilians in August Dawn Raid*: HRW, Reuters (Oct. 13, 2013), <https://www.reuters.com/article/us-syria-crisis-killings-idUSBRE99A03520131011>.

<sup>128</sup> Ben Hubbard, *Qaeda Brand in Syria Pursues Its Own Agenda*, N.Y. Times (Oct. 1, 2013), <https://www.nytimes.com/2013/10/02/world/middleeast/in-pushing-its-own-agenda-for-syria-a-qaeda-franchise-turns-rebels-into-enemies.html>.

innocent civilians being detained, handcuffed and blindfolded, and tortured by ISIS the following month.<sup>129</sup>

224. Defendants were well aware of ISIS’s brutality and the fact that they had been designated a terrorist organization at this time. In fact, in 2013, several months after U.S. journalist James Foley was initially captured by ISIS, advocates for Foley approached LCS to ask for LCS’s assistance in negotiating for Foley’s freedom. LCS executives repeatedly referred to ISIS as “jihadists” in internal emails and conceded that that they were negotiating with terrorists.<sup>130</sup>

225. As noted by the French Supreme Court in the context of the ongoing criminal proceedings against Lafarge in France:

The Investigating Chamber also noted that the terrorist nature of the IS could not have been unknown to Lafarge, which was informed of the situation in Syria through the minutes of the weekly meetings of the Syria Safety Committee, and specified that at the meeting of 12 September 2013, it was stated that since July, logistical flows and staff movements have been disrupted, and sometimes even blocked, by the Islamists, AN[F] and ISIS[,] . . . that the presence of these Islamist groups constitutes a threat for us . . . [and] that it is becoming increasingly difficult to operate without having to negotiate directly or indirectly with these networks classified as terrorists by international organisations and the United States.”<sup>131</sup>

226. Defendants continued to provide support to ISIS even as the news unfolded of the atrocities committed against the Yazidis, which stunned the world and drew immediate condemnation from governments and international authorities. On August 5, 2014, the U.N. Security Council condemned ISIS’s “systematic persecution of individuals from minority populations.” On August 7, 2014, the United States began airstrikes against ISIS in Iraq to break

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<sup>129</sup> Lina Sinjab, *Al-Qaeda’s Brutal Tactics in Syria Force Out Moderates*, BBC News (Nov. 27, 2013), <https://www.bbc.com/news/world-25109708>.

<sup>130</sup> SOF ¶¶ 31, 54, 93.

<sup>131</sup> Judgment of the Court of Cassation, Criminal Chamber, Appeal No. 19-87.367 at ¶¶ 40, 76 (Sept. 7, 2021), [https://www.courdecassation.fr/decision/6137092ff585960512dfe635?search\\_api\\_fulltext=lafarge&sort=&items\\_per\\_page=&judilibre\\_chambre=&judilibre\\_type=&judilibre\\_matiere=&judilibre\\_publication=&judilibre\\_solution=&op=&date\\_du=&date\\_au=](https://www.courdecassation.fr/decision/6137092ff585960512dfe635?search_api_fulltext=lafarge&sort=&items_per_page=&judilibre_chambre=&judilibre_type=&judilibre_matiere=&judilibre_publication=&judilibre_solution=&op=&date_du=&date_au=). See also ¶ 76.

ISIS's siege on Sinjar Mountain, and President Barack Obama made a speech explicitly addressing ISIS's crimes and stating that the "systematic destruction of the entire Yazidi people" called for by ISIS could constitute genocide. A group of U.N. experts reported violations and warned of potential genocide and grave danger for the Yazidis on August 12, 2014, and on August 15, 2014, the U.N. Security Council issued a resolution condemning ISIS, ANF, and all other Al-Qaeda affiliates and calling on U.N. members to prohibit all financial and trade relations with the groups. In September 2014, the United States began strikes against ISIS in Syria.

227. Lafarge was paying close attention to ISIS's acts and the reaction of the international community during this period. On August 18, 2014, the same day that the United States placed ISIS and ANF members on its list of Specially Designated Global Terrorists, Veillard emailed Herrault and Jolibois with the subject heading "terrorist watch list," notifying them of the designation.<sup>132</sup>

228. Notwithstanding ISIS's heinous acts—including the genocidal campaign against the Yazidis and the televised murder of Americans—the designation of ISIS as a terror group by the U.S., and the international community's universal condemnation of the terrorist group, Defendants not only continued, but in fact deepened their conspiracy with ISIS—ironing out a final revenue-sharing agreement with ISIS right at the time when the crimes against Plaintiffs reached its peak of barbarity in August 2014.

229. On August 6, 2014 three days after the terrorist attacks against the Yazidis began, Lafarge and LCS executives signaled their agreement to enter into the long-term revenue-sharing agreement with ISIS.<sup>133</sup> On August 15, 2014, less than two weeks after the genocide had started,

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<sup>132</sup> SOF ¶ 84.

<sup>133</sup> SOF ¶ 79.

on the day of the massacre in Kocho, and while thousands of Yazidis were still trapped on Sinjar Mountain, Lafarge and LCS committed to even more generous revenue-sharing terms with ISIS—hugely increasing their support at the height of the suffering inflicted on the Yazidis.<sup>134</sup>

**b. Defendants Went To Great Lengths To Conceal Their Conspiracy With ISIS**

230. Defendants’ support for ISIS directly and via intermediaries allowed them to manipulate the cement market and increase profits. But it also made them complicit in ISIS’s crimes. So, the conspiracy was not without risks. Fully aware that paying millions of dollars to terrorists violated several jurisdictions’ laws, including those of the United States, Defendants and their agents and co-conspirators took numerous steps to conceal their partnership with ISIS.

231. First, Defendants’ executives ensured that any documents regarding these terrorist payments did not contain the word “Lafarge” and stopped referencing ISIS by name as well. For example, on September 16, 2013, Pescheux instructed Tlass that “the name of Lafarge should never appear for obvious reasons in any documents of this nature,” referring to checkpoint passes from ISIS.<sup>135</sup> He continued: “Please use the words Cement Plant if you need but never the one of Lafarge.”<sup>136</sup> After a period during which Lafarge was entering into agreements and exchanging documents on ISIS letterhead, Pescheux also sent an internal email instructing several LCS employees that “we all have to stop [using] the acronym of an organization which is on terrorist lists” and instead use code words, indicating that he was both aware of and concerned about disclosing Lafarge’s support for FTOs.

232. Similarly, on September 4, 2014, Jolibois, LCS’s incoming CEO, complained to Tlass about documents that specifically referred to “Lafarge” by name: “The name Lafarge and

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<sup>134</sup> SOF ¶¶ 81, 83.

<sup>135</sup> SOF ¶ 32.

<sup>136</sup> SOF ¶ 33.

the fact that Lafarge ‘paid’ appears on the laissez-passer passes issued by ISIS. This is completely against our agreement with ISIS . . . Could you look into solving this issue?” Tlass agreed that “we have to change the name or have an alias. . . .”<sup>137</sup>

233. Second, and relatedly, Defendants had intermediaries—rather than Lafarge or LCS executives—engage directly with ISIS and other terrorist groups. As one of LCS’s security consultants put it, “it was especially important that the relationship would be handled by [Tlass’s] middlemen, since an exposure of this sort would have been compromising for LCS.”

234. Defendants also took steps to conceal the payments they made to these intermediaries. In fact, Lafarge and LCS executives directed Tlass and Taleb to submit invoices that did not reference their own names or the names of their companies, and that instead referenced payments for donations, unspecified professional fees, or personal expenses.<sup>138</sup> For example, on December 13, 2012, Pescheux emailed Tlass and directed that any future invoice should not be on Tlass’s company’s letterhead, but instead should be on that of a company outside of Syria.<sup>139</sup>

235. Third, in connection with their efforts to conceal payments and falsify records, Defendants purposely availed themselves of the U.S. financial system to funnel U.S. dollars to straw-man companies outside Syria and Iraq. LCS executives made clear that they preferred to transact through U.S. dollar bank transfers. On June 30, 2013, Pescheux emailed Tlass: “[W]e cannot continue the way we are settling the turnover invoices. Our preferred option would be the one we told you last October: a bank transfer in USD to the account of a duly registered company,” as opposed to a direct payment to Tlass in cash, which would appear more suspicious.<sup>140</sup> Thus,

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<sup>137</sup> SOF ¶ 87.

<sup>138</sup> SOF ¶ 55.

<sup>139</sup> SOF ¶ 57.

<sup>140</sup> SOF ¶ 60.

Defendants instructed Tlass, their terrorist intermediary, to create a new corporate entity outside of Syria, Cyprus, or France so that Defendants could surreptitiously transact in U.S. dollars—transactions that Defendants intended to transfer, clear, and be processed through New York. *See infra* Part VII(a).

236. A February 2, 2014 “External Support Agreement” between LCS and a new company created by Tlass in the United Arab Emirates confirmed that payments should be made in U.S. dollars.<sup>141</sup> LCS agreed to pay the new company “a monthly remuneration of 75.000USD” to channel payments to armed groups, including ISIS.<sup>142</sup>

237. Lafarge and LCS executives made similar efforts to disguise the nature of payments to Taleb, including by directing that payments reference only environmental consulting and be made using U.S. dollars. For example, on January 12, 2014, Pescheux emailed Taleb:

Prepare an invoice from [Taleb’s company], send to me by email and bring the original next week, for an amount of 4,402 USD just with “Environmental consultancy services for the months of October, November and December 2013” as a justification.<sup>143</sup>

238. A few weeks later, on February 5, 2014, Pescheux again required that payments reference only environmental consulting and be made in U.S. dollars:

If you want to have a chance to get paid for pozzolana and HFO, you have to prepare an invoice following my instructions and not your imagination.  
So you have to issue an invoice mentioning only:  
Consultancy services performed up to January 31, 2014 for a total amount of 4,836 USD.<sup>144</sup>

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<sup>141</sup> SOF ¶ 61.

<sup>142</sup> SOF ¶ 61.

<sup>143</sup> SOF ¶ 63.

<sup>144</sup> SOF ¶ 64.

239. On February 13, 2014, Taleb sent Pescheux the invoice “[b]ase[d] on your instruction.” The invoice, payable in U.S. dollars to the intermediary’s company, purported to be for “[c]onsultancy services.”<sup>145</sup>

240. International financial transactions denominated in U.S. dollars, unlike transactions denominated in Syrian pounds, are cleared through U.S.-based financial institutions located in New York. *See infra* Part VII(c).

241. In addition, as another way to conceal their partnership with ISIS from French auditors and law enforcement authorities, Lafarge and LCS executives regularly used personal email accounts serviced by U.S.-based email service providers, instead of their Lafarge corporate email addresses, to coordinate and carry out elements of their conspiracy.<sup>146</sup>

242. LCS’s own legal counsel instructed LCS’s CEO not to create business records concerning the company’s illegal terrorist financing. On September 8, 2014, in connection with a discussion about documents received from ISIS, Jolibois wrote to Veillard, “Thank you for sharing this information with [Herrault], I don’t want to write to him about this topic at his professional address (as recommended by [in-house counsel]).”<sup>147</sup> Lafarge executives used Gmail accounts to communicate about the conspiracy, and thus avoided leaving incriminating evidence on corporate email servers located in France that would be available to French auditors, regulators, and law enforcement officials.

**c. After Evacuating The Cement Plant, Defendants Tried To Cover Their Tracks**

243. After Defendants’ employees fled the Cement Plant in fear for their lives, and as the international community stepped up its multi-front action against ISIS, Defendants took further

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<sup>145</sup> SOF ¶ 65.

<sup>146</sup> SOF ¶ 18.

<sup>147</sup> SOF ¶ 88.



steps to conceal their conspiracy with ISIS. They did so by drafting a backdated contract-termination agreement that would allow them to falsely claim that Tlass’s relationship with LCS had been terminated before he conducted negotiations with ISIS in August and September 2014.<sup>148</sup>

244. Specifically, on September 29, 2014, Tlass informed Herrault and Jolibois that, in response to their prior requests, Tlass had opened a bank account in Dubai in the name of a new company that was not publicly linked to Tlass (“Tlass NewCo”).<sup>149</sup>

245. On October 9, 2014, Jolibois sent an internal email to Pescheux and Lafarge’s in-house counsel with the subject “New contract for [Tlass]” and saying that LCS owed Tlass two monthly fees each for \$75,000 for “services in July and August” plus reimbursement of 60,000 USD that was “already paid by [Tlass] to PYD”—meaning ISIS and other armed groups—ultimately totaling “210kUSD.” Jolibois further wrote that the in-house lawyer “would like to terminate the previous contract [with Tlass] on the date of 18th August to show evidence of company reaction to U.N. resolution, and to get a new contract to start from September 1st, 2014.” The “U.N. resolution” to which Jolibois was referring was the August 15, 2014 Security Council resolution condemning ISIS, ANF, and Al-Qaeda and calling on U.N. members to prohibit all financial and trade relations with the groups. In a subsequent email on October 14, Herrault clarified Lafarge would not pay Tlass without a new backdated contract.<sup>150</sup>

246. Jolibois then sent an email to Tlass with the subject line “Agreement for Regional Security Consulting Services,” which attached copies of: (1) the new consulting agreement between a holding company created by LCS (“LCS NewCo”) and Tlass NewCo, and (2) the

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<sup>148</sup> SOF ¶ 96.

<sup>149</sup> SOF ¶ 97.

<sup>150</sup> SOF ¶ 98.

backdated Termination Agreement between LCS and Tlass NewCo that made it seem like the original arrangement was terminated in mid-August 2014.<sup>151</sup>

247. In his cover email, Jolibois explained that the new consulting agreement was “written in such a way as to” take “into account the compensation for termination of the previous contract (210k USD for 202k USD which are actually due).”<sup>152</sup> A \$210,000 lump sum payment compensated ISIS intermediary Tlass for work he had already performed negotiating an agreement with ISIS and reimbursed him for making fixed monthly “donation” payments to terrorist groups, including ISIS.<sup>153</sup>

248. The Termination Agreement with Tlass was backdated to August 18, 2014. But the metadata of the backdated Termination Agreement indicates that the document was not drafted by Lafarge’s in-house lawyer until October 3, 2014, two weeks after LCS had evacuated the Cement Plant.<sup>154</sup>

249. On October 23, 2014, after the parties signed the new consulting agreement and the backdated Termination Agreement, Tlass sent an invoice for \$210,000. Lafarge paid the \$210,000 invoice with a wire transfer from Lafarge’s operating account at a financial institution in Paris, through the Eastern District of New York, to intermediary banks in New York City, which transmitted the wire to Tlass NewCo’s account at a financial institution in Dubai. *See infra* Part VII(a).<sup>155</sup>

250. On information and belief, the additional U.S. dollar payments due under the new Consulting Agreement were paid after October 2014 in the same manner.

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<sup>151</sup> SOF ¶ 100.

<sup>152</sup> SOF ¶ 100.

<sup>153</sup> SOF ¶ 37.

<sup>154</sup> SOF ¶ 101.

<sup>155</sup> SOF ¶¶ 102, 103.

251. In addition to the lump sum payment to compensate for work already performed, Defendants continued to pay their intermediaries to work with ISIS. Those payments for ISIS, including to or through Tlass, continued after Lafarge left the Cement Plant; the new consulting agreement with Tlass required that Defendants give him monthly payments of \$30,000 on a going-forward basis.<sup>156</sup>

252. After the Cement Plant was seized, intermediary Taleb was reportedly liaising with ISIS in its efforts to sell the remaining cement in the plant and restart operations. According to a publicly available French intelligence report summarizing a meeting between ISIS, Turkish businessmen, and Taleb in December 2014, ISIS had already at that point sold over 65,000 tons of cement, worth \$6.5 million, and was in negotiations to sell an additional \$5 million of the cement left at the plant.

**d. LafargeHolcim Finally Discloses That Defendants Transacted With Terrorists**

253. In July 2015, after over a year of negotiations, Holcim completed its merger with Lafarge, combining the two largest building materials companies in the world. The payments to terrorists were not disclosed to Holcim or its representatives during pre-acquisition due diligence meetings.<sup>157</sup> Lafarge executives who had approved of Lafarge's payments to ISIS remained in leadership positions in the newly formed company, LafargeHolcim.

254. On February 19, 2016, a website run by a Syrian opposition group reported that Lafarge and LCS had purchased raw materials from and made other payments to ISIS. The report included partially redacted images of emails sent to and from Lafarge and LCS executives' email accounts, discussing payments to ISIS.<sup>158</sup>

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<sup>156</sup> SOF ¶ 100.

<sup>157</sup> SOF ¶ 105.

<sup>158</sup> SOF ¶ 108.

255. On April 24, 2017, after retaining a U.S. law firm to conduct an investigation, LafargeHolcim issued a press release acknowledging for the first time that Lafarge and LCS made payments to terrorists, admitting that “in late 2011, the plant became increasingly subject to disruption by local armed groups,” that “LCS used intermediaries to avoid direct contact with these armed groups,” and that “LCS made and continued to make payments to such intermediaries in furtherance of operations.” LafargeHolcim admitted that “LCS management kept Lafarge SA well-informed of developments,” noting that “the combination of war zone chaos and the ‘can do’ approach to maintain operations in these circumstances may have caused those involved to seriously misjudge the situation and neglect to focus sufficiently on the legal and reputational implications of their conduct.”<sup>159</sup>

## **VI. DEFENDANTS’ PAYMENTS AND COOPERATION SUBSTANTIALLY ASSISTED THE ACTS OF INTERNATIONAL TERRORISM AGAINST THE YAZIDI COMMUNITY**

### **a. ISIS Had A Centralized Financial System Which Financed The Commission Of International Crimes**

256. Like Lafarge and its subsidiaries, ISIS exercised deep control over its activities and finances in the territories it controlled. ISIS collected money from businesses and individuals in the territories under its control and directed it towards its centralized financial system, which in turn was used to finance ISIS’s terrorist attacks across its declared “caliphate,” including genocide in Sinjar.

257. Lafarge did not only pay into the protection racket ISIS enforced. It sought to partner as closely as possible with ISIS, pay percentages of its sales to ISIS, purchase materials from ISIS, sell its cement to ISIS, and ultimately enter an agreement for ISIS to obstruct

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<sup>159</sup> SOF ¶ 110.

competition in exchange for a slice of the Cement Plant's profit. In return, ISIS offered Defendants the opportunity to increase profits as ISIS was consolidating territorial power through its terrorist attacks.

258. Funds from businesses and individuals in its territory—such as the money Lafarge willingly handed over—were one of ISIS's most critical sources of funding. The \$7.21 million from Defendants to ISIS and ISIS-controlled entities materially enhanced ISIS's ability to expand or sustain its power and territorial control by committing the terrorist attacks described above, as Defendants knew but chose to disregard. *See supra* ¶¶ 4–5. The cost of ISIS's individual attacks and salaries for their fighters paled in comparison to the funding provided to those groups by Defendants.

259. The U.N. Security Council reported that ISIS's "core leadership" in Syria and Iraq exercised "systematic financial direction" over its provinces' funding" and a U.N. investigation confirmed ISIS's "centralized, top-down approach to the administration of [ISIS's] territory." Similarly, terrorism scholars Dr. Colin Clarke, Director of Research at The Soufan Group, and Dr. Phil Williams, Professor Emeritus at the University of Pittsburgh, explain that "[m]uch like its predecessor, AQI, [ISIS] . . . adopted a top-down approach that maintained hierarchical control over and a high degree of accountability for its financial assets."

260. Such systematic financial direction ensured that Defendants' money in Syria could support ISIS's terrorist attacks in other areas in which it operated. In August 2014, ISIS bulldozed a path through the berm along the Iraq-Syria border to create a new road and proclaimed, "We are one state, the Islamic State," waving its stark black flag. With the dissolution of the national boundaries between Iraq and Syria, resources, fighters, and families flowed both ways across the

border, supported by ISIS's central treasury to further ISIS's terrorist goals. Defendants' money was no exception.

261. Bayt Al-Mal ("Treasury") was the core department responsible for the collection, management, and distribution of ISIS funds. It was through this central treasury that ISIS funded its attacks on innocent civilians. According to a U.N. investigation, the Treasury provided "vital material and financial support" to ISIS's Diwan Al-Jund ("Military Ministry"), and "specifically those units . . . that are alleged to have committed international crimes." The Treasury was central to ISIS's day-to-day operations and implementation of its objectives, including its terrorist attacks.

**b. Lafarge's Financial Contributions Were Significant In Light Of ISIS's Low Operational Costs**

262. Lafarge pled guilty and admitted to giving ISIS and linked groups \$5.92 million. And Lafarge admitted in its plea deal that the value of the cement that ISIS seized generated \$3.21 million. So even by Lafarge's own admission, ISIS and other terrorist groups received almost \$10 million dollars from Defendants in cash and profit from cement, and of this, \$7.21 million went to ISIS and ISIS-controlled entities. The actual amount of money that ISIS received from the funds provided by Lafarge and sale of cement left in the Plant from Lafarge is likely over \$15 million. *See supra* ¶ 37. Lafarge placed money in ISIS's hands at exactly the time ISIS was consolidating its power in Iraq, culminating in its takeover of Mosul in June 2014 and invasion of Sinjar in August. Lafarge had to funnel large amounts of money into LCS, including to pay ISIS. In June 2014, for example, LCS received \$11 million from Lafarge via Lafarge Cyprus to fund its operations.

263. ISIS fighters received a base pay of \$200-400 per month. Five-thousand dollars to ISIS could have covered a dozen terrorists (at \$400 per fighter) and equipment for a month. Five-thousand dollars was sufficient to purchase dozens of bomb components or finance multiple

attacks. So, the income generated from Lafarge was enough to fund the attack on Sinjar many times over. The number of ISIS fighters who overtook Sinjar is estimated to have only been in the hundreds, since they faced no organized resistance. The 20 million Syrian pounds (\$142,800) Lafarge paid ISIS through Tlass alone in May 2014 would have paid for over 350 ISIS fighters' salaries for the entire month of August.

264. In August 2014, when ISIS invaded Sinjar and launched its genocidal campaign against the Yazidis, ISIS had already received large amounts of funding from Lafarge. And just days after ISIS began its genocide—despite extensive coverage of the atrocities committed against the Yazidis—Lafarge committed to *increasing* the amount of funding that ISIS could generate by giving ISIS a share of its profits, i.e. the “cake,” under a long-term revenue-sharing agreement. *See supra* Part IV(e).

265. In the ongoing criminal case against Lafarge and eight of its executives in France, French criminal investigators reportedly allege that the “amount and duration” of Lafarge’s multi-million-dollar payments to ISIS in Syria allowed ISIS to “plan and carry out violent operations in the area and abroad.” The French Supreme Court affirmed the charge of complicity in crimes against humanity as well as terrorism charges against Lafarge, finding that there was sufficient “serious and corroborating” evidence that Lafarge provided support to ISIS while having “precise knowledge” of the nature of the group’s activities, “likely to constitute crimes against humanity.” U.S. prosecutors agreed that Lafarge knowingly and willingly supported terrorism, with Deputy Attorney General Monaco stating that “through their support and funding, Lafarge enabled the operations of a brutal terrorist organization.”

**c. Lafarge's Money Was Channeled To The Leadership Cell, ISIS's Military And Governance Authority**

266. In accordance with ISIS's standard practices, it is likely that 20 percent of the funds Lafarge admitted to providing to ISIS would have gone to Al-Baghdadi and ISIS's leadership. The Leadership Cell and Al-Baghdadi in turn played a key role in planning and ordering the genocide in Sinjar as well as attacks that harmed many others, including the murders of U.S. citizens Stephen Sotloff, James Foley, and Kayla Mueller.

267. ISIS's Leadership Cell, was, during relevant periods, a leadership group that approved and disseminated new ISIS membership, expansion plans, and strategy. ISIS's Leadership Cell was composed of Al-Baghdadi and several advisors. It ensured that all major ISIS actions were in accordance with Islamic law and ISIS's overall strategy. The U.N. has described that "a network of senior ISIL leadership . . . acted as trusted financiers, diverting ISIS wealth . . . and aiding and abetting the commission of the crime against humanity of persecution." The Leadership Cell was the "primary decision-making organ . . . of the ISIL so-called caliphate[,] . . . closely oversaw the organization's finances and had authority over military disbursements, including . . . for procurement of arms and supplies."

268. ISIS's predecessor, ISI, had a funding structure that required that 20 percent of all income derived from its taxation went to Al-Baghdadi and his Leadership Cell for use in planning and committing attacks, and ISIS continued the same practices. According to terrorism scholar Brian Fishman, the "provinces," or geographic areas under ISI's control, "carefully tracked both revenue and expenditures and passed 20 percent of their income to the national-level ISI [Al-Baghdadi and the group's leadership], which redistributed the funds as needed." ISIS was a remarkably centralized group, with multiple sources, including ISIS's magazine Dabiq and a guide to its "tax" practices, demonstrating that ISIS's leadership demanded payments from areas under



its control based on its interpretation of Islamic law. This interpretation specified that 20 percent of goods such as spoils of war and underground or mineral wealth be paid to ISIS's central funds. Non-Muslims permitted to remain in ISIS territory paid greater amounts than Muslims under ISIS's control. Thus, it is likely that at least 20 percent of the funds Lafarge and LCS have admitted to paying ISIS went to Al-Baghdadi and the Leadership Cell to plan and execute attacks, including those acts that harmed Plaintiffs.

269. The 20 percent rule applied not only to finances collected by ISIS, but also to human beings who ISIS captured. As explained by the U.N. Commission of Inquiry, "ISIS made eighty percent of the women and girls available to its fighters for individual purchase, the apportioning being drawn directly from religious interpretation . . . The remaining twenty percent [were] held as collective property of ISIS [leadership] and were distributed in groups to military bases throughout Iraq and Syria." In fact, ISIS leaders were personally involved in the enslavement, torture, and sexual abuse of Yazidi women and girls, and Al-Baghdadi in particular held Yazidi women enslaved at his residence and sexually abused them.

270. Because of its role as a religious, governmental, and military authority, the Leadership Cell likely approved: (1) payments and support to fighters and their families who emigrated to ISIS territory; (2) the strategy of expansion into Sinjar; (3) strategies and tactics to target the Yazidi community; (4) the terrorist attack on the Yazidi community; (5) the plundering and destruction of Yazidi homes and businesses to further fuel ISIS's operations; (6) the enslavement and torture of Yazidi women and children in accordance with ISIS's warped view of Islam; (7) the creation and management of markets where Yazidi women were enslaved and sold; and (8) the forced conversion, enslavement, and conscription of boys to use as child soldiers. German courts have indeed concluded that it was "inconceivable"

that such a large-scale attack against the Yazidis in Sinjar could be carried out without the involvement of ISIS's caliph and senior leadership, "considering the strictly hierarchical organizational structure of ISIS." Lafarge's funds therefore would have contributed directly to the horrific abuses inflicted upon the Yazidi community, including Plaintiffs, and Lafarge moreover increased its support to ISIS while knowing that it was a criminal offense to do so, and knowing about ISIS's highly publicized ongoing abuses.

**d. Lafarge's Money Was Channeled Through Raqqa, The Center Of ISIS's Military Planning And Human Trafficking Of Yazidis**

271. The closest major city to the Cement Plant was Raqqa, which was also ISIS's self-declared capital and one of the first cities to fall to opposition groups during Syria's civil war. As ISIS gained territory in 2014, Al-Baghdadi declared that Raqqa would be the seat of his state, due to its proximity to both Iraq and Syria.

272. Thereafter, Raqqa became critical to planning ISIS's outwards expansion, and ISIS's leadership, strategy, and governance policy were developed in Raqqa. A Pentagon spokesperson confirmed that ISIS "leaders" and "bureaucrats" who served as "the administrative backbone of [ISIS's] militant organization" were based in "the Islamic State group's self-declared capital of Raqqa." U.S. Secretary of State John Kerry stated in 2015 that Raqqa was "the core where they're planning these things"—that is, where ISIS planned its attacks. A Pentagon spokesperson likewise confirmed that ISIS's militant administration and leadership were based in Raqqa. As described by the Commander of U.S. Central Command, Raqqa was "where [ISIS's] plotting takes place . . . Raqqa is recognized as the financial, leadership and external ops center of the Islamic State."

273. Given the proximity to the Cement Plant and the role of Raqqa as the center of the ISIS bureaucracy, Lafarge negotiated and partnered with representatives in Raqqa to maintain and

strengthen operations at the Cement Plant. Lafarge has admitted that LCS's former risk manager went to Raqqa to meet with individuals connected to ISIS's leadership to negotiate terms for its deals with the terror group,<sup>160</sup> and that Tlass reported to Lafarge executives on meetings between his representatives and ISIS's representatives in Raqqa.<sup>161</sup> LCS's former procurement manager similarly negotiated to buy pozzolana from a Raqqa-based supplier who signed emails with his title, "The Emir of the Investment Office in the Islamic State in Iraq and Sham. The Wilayat [Province] of al-Raqqa."<sup>162</sup>

274. ISIS's governor of Raqqa was Ali Musa Al-Shawakh, known as Abu Luqman, from early 2014 until his death in an airstrike in 2018. Abu Luqman had been a powerful ANF terrorist but then switched his allegiance to ISIS and recruited several hundred ANF fighters to join ISIS's ranks in Raqqa. He served on ISIS's Leadership Cell, as well as on ISIS's Intelligence Cell. Abu Luqman was also head of ISIS's Directorate of General Security, which was responsible for intelligence gathering, detentions, state security, and external intelligence. He is accused of planning ISIS's massive terrorist attacks in Paris and of supervising foreign hostages.

275. Lafarge, through intermediaries and with knowledge and intent, directly conspired with Abu Luqman. Public reports state that Abu Luqman served on a "shadow board" of the Cement Plant, and that he controlled ISIS's oil sales in northern Syria, which likely included sales of fuel to LCS. In December 2014, Abu Luqman himself was present, alongside Lafarge's agent Taleb, to facilitate ISIS's barter of remaining materials in Lafarge's factory, worth \$11.5 million, to buyers including Turkish businessmen. The next month, at Defendants' expense, Taleb visited

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<sup>160</sup> SOF ¶ 70.

<sup>161</sup> SOF ¶ 45.

<sup>162</sup> SOF ¶¶ 52, 53.

Lafarge's headquarters in Paris to report on the ongoing negotiations with Abu Luqman for ISIS to re-open the plant under Lafarge's supervision.

276. On information and belief, the local ISIS leadership in Raqqa helped plan for and train the fighters who launched the attack on the Yazidi community and siege of Sinjar Mountain. The Raqqa Cell was critical to determining when and how to recruit or accept additional members, where to expand, and how to commit attacks in Raqqa and its surrounds by (1) vetting, recruiting, and establishing new ISIS "provinces," including all geographic expansion; (2) serving as the "bridge" between ISIS's Leadership Cell and the local cells on the ground in other locations; and (3) supplying logistical, training, and financial support for ISIS's military attacks. The Raqqa Cell provided funds, fighters, training, resources, propaganda, and aid to ISIS fighters across its territory.

277. Raqqa was also a key location in ISIS's Yazidi slave trade. A large number of Yazidis were brought into Syria, specifically Raqqa, and held captive, catalogued, and sold as slaves. Plaintiffs in this case describe family members being taken there after being captured in 2014. Many Yazidi women and girls who were forcibly transported from different locations in Sinjar to Raqqa's holding sites and underground prisons were gathered, registered, photographed, and sold into slavery from there, including from slave markets.

278. Because of its role as the local government, the Raqqa Cell likely would have had to approve in Raqqa and surrounding areas (1) the cataloguing, captivity, and sale of Yazidis as "slaves," or human trafficking victims; (2) the confinement and treatment of Yazidis held captive; and (3) the human trafficking market. For these reasons, the Raqqa Cell not only played a key role in the attack on Sinjar, but also in the massive number of Yazidis being captured, sold, and tortured in Syria.

**e. ISIS Used Cement And Raw Materials From Defendants' Plant To Shelter Its Fighters And Keep Yazidis In Captivity**

279. A key part of ISIS's military strategy was the construction of underground tunnels and bunkers which could be used to hide from airstrikes, launch military offensives, and enslave and torture prisoners. ISIS built these extensive underground networks in Syria and Iraq, including in areas around Raqqa and Mosul. These underground networks were sophisticated shelters equipped with sleeping quarters, electricity for lights and fans, and medical supplies, built so that fighters could evade airstrikes, move freely underground, and store weapons without being detected by coalition forces or aerial imagery. When Kurdish forces took back the city of Sinjar from ISIS in late 2015, they uncovered an extensive tunnel and bunker system described by one Kurdish commander as "like a network inside the city." This network of tunnels enabled ISIS to remain in Sinjar and surrounding villages far longer than it could have out in the open, extending its occupation and ensuring the destruction of Yazidis' homes and property there.

280. In addition to using these underground warrens for military advantage, ISIS also used its underground networks to hide and terrorize hostages, including captured Yazidis. A 2016 report by the U.N. describes interviews of Yazidi women who were among the hundreds captured and held in Raqqa in "underground locations, such as in tunnels, for four to five months, without access to natural light, drinking water, or proper food." One plaintiff in this case, Plaintiff Nawaf Sulaiman, describes his sister being taken to Raqqa and held underground for two years before finally being able to escape.

281. On information and belief, ISIS used the cement it secured from Lafarge, including pursuant to the long-term revenue-sharing agreement, *see supra* Part IV(e), to build and reinforce this network of underground tunnels and bunkers. These tunnels were fortified to withstand coalition airstrikes above ground—requiring high-grade cement that only sophisticated factories

like the one operated by LCS could provide. LCS's cement sales, approved by Lafarge, thus directly supported ISIS's terrorist operations and ability to hold Yazidis in captivity and slavery.

282. LCS did not only sell cement directly to ISIS for use in its operations. Upon LCS's hasty evacuation of the Cement Plant in September 2014, ISIS also took massive amounts of cement—\$3.21 million dollars' worth according to Lafarge's plea deal, but reportedly upwards of \$11.5 million—from the plant. ISIS also gained access to LCS's abandoned stockpile of hydrazine, among other materials. Used to run production machinery at the Cement Plant, this highly toxic chemical can also be used as rocket fuel or to make explosives. Because these materials were not properly secured, tons of hydrazine remained at the Cement Plant to be seized by ISIS and could be used to further its terrorist attacks.

## **VII. DEFENDANTS' UNLAWFUL CONDUCT HAD A SUBSTANTIAL NEXUS TO NEW YORK AND THE UNITED STATES**

283. Defendants depended on connections to the United States to run their terrorist-financing scheme, knowingly exploiting New York's banking system to conduct numerous U.S. dollar wire transfers they caused to clear through New York banks. Their reliance on U.S. banks was critical: Defendants considered "USD" their "preferred option."<sup>163</sup> They deliberately routed those payments through New York banks to make payments look legitimate, ensure that ISIS received its preferred currency, avoid depreciation in the value of the Syrian pound, and evade review by French auditors and regulators. Defendants knew and depended on the legitimacy, speed, and reliability of New York's banking system and used it for these reasons.

284. Likewise, Lafarge used U.S. email providers, primarily Gmail, to plan and execute their criminal assistance to terrorists outside of ordinary corporate record keeping. On the advice

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<sup>163</sup> SOF ¶ 60.

of their own corporate counsel, they avoided using their company email addresses to plan and execute their conspiracy with ISIS. By sending their emails through the United States, Defendants impeded French law enforcement, which was the authority most likely to uncover the scheme and criminally charge their executives. Lafarge's use of a U.S. service provider to coordinate its conspiracy enabled it to benefit from U.S. infrastructure, U.S. engineering, and U.S. law.

285. The conspiracy was inherently tied and integrally linked to the United States. ISIS recruited many Americans to its ranks, and Defendants' conspiracy with ISIS involved executives who were U.S. nationals. The conspiracy included overt acts in furtherance of the conspiracy targeting the United States, including through public statements against the United States and kidnappings, public executions, rapes, and other violent acts against Americans. When ISIS targeted the United States, and publicly executed Americans as a key terror tactic, it increased its perceived power regionally and globally, increasing its ability to hold its territory and to expand.

**a. Defendants Purposefully Relied On New York Banks To Clear The U.S. Dollar Transactions They Used To Finance Terrorism**

286. Defendants intentionally used the U.S. financial system and caused wire transfers to clear through New York banks, thereby purposefully availing themselves of New York's banking system. Specifically, Defendants directed their banks to complete U.S. dollar-denominated wire transfers to support its scheme to fund ISIS, and their officials knew those directions required the use of New York banks. Defendants' wire instructions caused their payments to clear in New York, including through one admitted transaction related to this suit in this District.<sup>164</sup>

287. Defendants' payments to terrorists relied on correspondent banks located in New York. Correspondent, or intermediary, banks are the conduit for a financial transaction when a

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<sup>164</sup> SOF ¶ 103.

sender's bank cannot perform a direct transfer in the desired currency with the recipient bank. Almost all correspondent banks that perform U.S. dollar transactions are located in New York, which allows them to use the U.S. Clearing House Interbank Payments System ("CHIPS"). CHIPS estimates that in 2015, it was responsible for processing over 95 percent of cross-border transactions denominated in U.S. dollars. On information and belief, Defendants' transactions relied on CHIPS to clear international U.S. dollar transfers among its international banks.

288. Defendants preferred transacting almost entirely in U.S. dollars, both because U.S. dollars were protected from the rapid depreciation of the Syrian pound and because the international transactions through the U.S. banking system masked the true purpose and intent of their transfers. On information and belief, there have been at least twenty-three relevant transactions related to Defendants' terrorist-funding scheme that were denominated in U.S. dollars, although this is only a list of transactions available without discovery.

289. On information and belief, Defendants made at least nine U.S. dollar-denominated upstream payments (payments from a Lafarge entity to LCS) and at least fourteen U.S. dollar-denominated downstream payments (payments from LCS to an intermediary) through the New York banking system. Upstream payments were the ones that Lafarge made, typically through Lafarge Cyprus, to send LCS money for operating expenses—which included payments to terrorists. *See infra* ¶¶ 290-291). Lafarge made downstream payments to Tlass and Taleb so that they could pay armed groups such as ISIS and ANF on Lafarge's behalf. The chart below depicts each payment:

Date	Category	Sender	Recipient	USD Amount
4/28/2011	Upstream	Lafarge Cyprus	LCS	\$20,000,000
7/31/2011	Upstream	Lafarge Cyprus	LCS	\$5,000,000
8/25/2011	Upstream	Lafarge Cyprus	LCS	\$10,000,000



<b>Date</b>	<b>Category</b>	<b>Sender</b>	<b>Recipient</b>	<b>USD Amount</b>
8/25/2011	Upstream	Lafarge Cyprus	LCS	\$5,000,000
3/18/2012	Upstream	Lafarge Cyprus	LCS	\$10,000,000
9/27/2012	Upstream	Lafarge Cyprus	LCS	\$16,500,000
12/27/2012	Upstream	Lafarge Cyprus	LCS	\$15,500,000
July 2013	Downstream	LCS	Tlass	\$75,000
August 2013	Downstream	LCS	Tlass	\$75,000
September 2013	Downstream	LCS	Tlass	\$75,000
9/30/2013	Upstream	Lafarge Cyprus	LCS	\$5,000,000
October 2013	Downstream	LCS	Tlass	\$75,000
November 2013	Downstream	LCS	Tlass	\$75,000
December 2013	Downstream	LCS	Tlass	\$75,000
January 2014	Downstream	LCS	Tlass	\$75,000
February 2014	Downstream	LCS	Tlass	\$75,000
February 2014	Downstream	LCS	Taleb	\$4,836
March 2014	Downstream	LCS	Tlass	\$75,000
April 2014	Downstream	LCS	Tlass	\$75,000
May 2014	Downstream	LCS	Tlass	\$75,000
June 2014	Downstream	LCS	Tlass	\$75,000
6/10/2014	Upstream	Lafarge Cyprus	LCS	\$11,000,000
10/23/2014	Downstream	Lafarge Cyprus	Tlass	\$210,000

290. On information and belief, the nine upstream payments, totaling \$98 million, were disbursements made under an April 7, 2011 loan agreement between Lafarge Cyprus and LCS to give LCS operational funding, including money used to pay terrorists. Lafarge's General Counsel and Corporate Secretary signed the loan agreement on Lafarge Cyprus's behalf and oversaw the first seven disbursements and Lafarge's Assistant General Counsel oversaw the final two disbursements. Lafarge Cyprus funded LCS at Lafarge's direction and subject to its control. Indeed, Lafarge admitted it was responsible for the October 23, 2014 payment to Tlass, although

Lafarge structured that payment as nominally originating from Lafarge Cyprus.<sup>165</sup> The other Lafarge Cyprus payments above similarly occurred at Lafarge’s direction. Lafarge Cyprus sent the upstream payments in part by wiring U.S. dollars into accounts LCS maintained with Bank Audi in Lebanon and Syria. LCS in turn paid out the U.S. dollars to pay Taleb and Tlass to dole out to the terrorist groups with whom Lafarge conspired. Lafarge Cyprus’s payment method was the best way for LCS to seek to evade sanctions and other legal prohibitions on financial transfers to Syria.

291. When Lafarge decided to make an \$11 million disbursement on June 10, 2014 through Lafarge Cyprus, it had long known LCS was making payments to terrorists including ISIS through intermediaries—it was doing so with Lafarge executives’ oversight and approval. It also knew LCS was paying Tlass \$75,000 USD monthly to compensate him for negotiating with ISIS. Lafarge still decided to pay LCS an additional \$11 million in what an email from its treasury manager called “fresh cash”—i.e., cash for terrorists.

292. All but one of the fourteen downstream payments were payments LCS made to Tlass to enable his payments to ISIS and ANF; the remaining payment was a \$4,836 payment to Taleb, also an ISIS fixer. *See supra* ¶¶ 235-36. With regard to the \$75,000 monthly payments that LCS made to Tlass, Lafarge’s agreement with Tlass provided that Tlass would “retain \$50,000 and the remaining \$25,000 would be disbursed to armed groups.”<sup>166</sup> The amounts were purposefully in U.S. dollars for the purposes of stability and concealment described above. The final payment of \$210,000 included \$150,000 to cover Tlass’s monthly stipend from July and August 2014. On information and belief, U.S. dollar payments, which were required under the contract Defendants

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<sup>165</sup> SOF ¶¶ 102-03.

<sup>166</sup> SOF ¶ 61.

negotiated with Tlass, and which were also paid to intermediary Taleb, continued after October 2014 as Defendants continued to try to regain control of the Cement Plant into and after early 2015.

293. The earlier upstream payments were likewise linked to Defendants' terror-financing scheme through their intermediary Tlass. Beginning in or around 2010, Lafarge and LCS began paying Tlass in monthly installments under a "local project support agreement." By then, Tlass was a known fixer for the Assad regime, which was part of the reason why Lafarge hired him and placed him on its board. Tlass's close ties to the regime connected Defendants to the Syrian government. The Assad regime was then a notorious terrorist sponsor that provided substantial support to ISIS and ANF's predecessor, AQI. While Defendants were partnering with one of the regime's most infamous fixers, Syria was openly aiding AQI (and later ISIS) through money, recruiting, training, and safe haven. As "[n]umerous courts" have found after considering the evidence, "Syria supported ISIS and its predecessor organizations."<sup>167</sup> Defendants' U.S. dollar financing thus was linked to Syrian-sponsored terrorism from the outset.

294. While the specific identity of the terrorists Tlass supported on Lafarge's behalf evolved, Lafarge and LCS continuously paid Tlass in U.S. dollars to maintain good relations with violent Syrian groups. Those efforts focused at first on the Assad regime and AQI, and later evolved to include ISIS and ANF, reflecting a continuous course of conduct dating back to at least 2010. When Defendants started using the U.S. banking system to cover LCS's payments to Tlass in 2011, therefore, it knew it was paying him to maintain LCS's relationships with Syrian terrorist networks. Lafarge's decision to extend that strategy to ISIS and ANF in 2013 and 2014 was a foreseeable outgrowth of the same strategy and conduct.

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<sup>167</sup> *Fields v. Syrian Arab Republic*, No. 18-1437, 2021 WL 9244135, at \*3 (D.D.C. Sept. 29, 2021).

295. Lafarge's U.S. dollar transactions almost certainly cleared through CHIPS, and thus through New York banks. Participating in the clearing system requires U.S. presence, in part to ensure that U.S. law will govern cross-border U.S. dollar transactions, and most banks able to conduct such cross-border transactions are based in New York.

296. On information and belief, Defendants' U.S. dollar transactions followed the norm and were sent via New York's banking system. This allegation is based on the specific banks Defendants used to effectuate these transactions and on at least three examples of transactions that Lafarge and Lafarge Cyprus specifically cleared through New York (beyond the one transaction to which it has admitted).

297. Defendants relied predominantly on three bank branches in funding their payments to terrorists: Bank Audi (Lebanon), Bank Audi (Syria), and BNP Paribas (Egypt). The use of these banks supports the allegation that Defendants purposefully cleared their U.S. dollar transactions through New York due to their correspondent bank relationships with New York banks.

298. LCS held accounts with Bank Audi SAL ("Bank Audi Lebanon") that it used to make many of its payments to Tlass and Taleb and to receive upstream funding from Lafarge and Lafarge Cyprus. Bank Audi Lebanon was based in Beirut and operated as the Lebanese branch of Bank Audi, a multinational bank. Bank Audi Lebanon maintained U.S. dollar correspondent accounts at least at the following New York banks, all of which Bank Audi has publicly acknowledged:

<b>No.</b>	<b>Correspondent U.S. Bank Relationship in New York</b>	<b>Correspondent U.S. Bank SWIFT Code<sup>168</sup></b>
<b>1</b>	Standard Chartered Bank – NY	SCBLUS33XXX
<b>2</b>	JPMorgan Chase Bank, N.A.	CHASUS33XXX
<b>3</b>	The Bank of New York Mellon	IRVTUS3N
<b>4</b>	HSBC – NY	MRMDUS33XXX
<b>5</b>	Citibank, N.A.	CITIUS33XXX

299. Bank Audi Lebanon does not have independent dollar clearing capabilities. It processed Defendants’ U.S. dollar transactions through the New York banking system by routing their funds through Bank Audi’s correspondent accounts with these New York banks, including but not limited to JPMorgan Chase’s New York branch.

300. Bank Audi Lebanon’s standard settlement instructions support the conclusion that Defendants’ transactions relied on New York correspondent accounts. Standard settlement instructions detail the accounts a financial institution will use to complete transactions depending on the currency the institution’s customer selects. Before the relevant time frame, Bank Audi published its standard settlement instructions in the *Banker’s Almanac*, an authoritative and publicly available compendium of international banking information. Those instructions, available to Defendants, specified that Bank Audi Lebanon typically settled U.S. dollar wire transfers through its correspondent accounts at “The Bank of New York, New York” and “JPMorgan Chase Bank, National Association, New York.”

301. On information and belief, from 2011 through 2015, LCS used Bank Audi Syria S.A. (“Bank Audi Syria”) as Bank Audi’s branch in Damascus. On information and belief, at all

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<sup>168</sup> Some of these accounts were used for Eurodollar-related transactions that flowed through the U.S. banking system. On information and belief, Defendants likely used the same correspondent accounts to facilitate their U.S. dollar-denominated transactions or used other correspondent accounts at the same banks to facilitate such transactions.

relevant times, Bank Audi Syria faced significant obstacles conducting cross-border U.S. dollar-denominated transactions due to applicable U.S. sanctions. So, LCS relied on its U.S. dollar accounts at Bank Audi Lebanon instead for U.S. dollar transactions.

302. On information and belief, on or about 2013, Lafarge and Lafarge Cyprus also instructed LCS to open an Egyptian bank account in the name of Lafarge's Egyptian subsidiary, Lafarge Middle East & Africa Building Materials, which Lafarge internally called "LMEA." On information and belief, LCS opened this LMEA account at BNP Paribas's branch in Cairo. LCS regularly used its "LMEA Account" to make and receive U.S. dollar payments, including by making a July 2013 payment of \$75,000 from LCS to Tlass. Lafarge funded the Account, via Lafarge Cyprus in U.S. dollars as needed, for LCS's benefit. On information and belief, Defendants used this account to make many suit-related U.S. dollar payments, including transactions not listed among the 23 in the table above.

303. Like Bank Audi, BNP Paribas's subsidiaries clear their U.S. dollar transactions through New York. According to its 2012 Patriot Act certification, BNP Paribas's subsidiaries, including its Egyptian branch, relied on "correspondent banks in the United States." BNP Paribas's global Corporate and Investment Banking Group, of which the LMEA Account was a part, regularly relied on U.S. banks to clear its U.S. dollar transactions. Due to a highly publicized U.S. enforcement action in mid-2014, BNP Paribas was forced to suspend U.S. clearing operations for a year. As a prominent French newspaper noted in reporting on that action, BNP Paribas recognized that its U.S. dollar transactions for sanctioned entities exposed it to U.S. criminal penalties, because when "any dollar transfer passes through the United States to be cleared by the

American financial system, [that] dollar transaction is automatically governed by U.S. law.”<sup>169</sup> On information and belief, BNP Paribas’s Egyptian branch cleared U.S. dollars the same way until that suspension.

304. BNP Paribas’s standard settlement instructions confirm that Defendants’ transactions using the LMEA Account cleared in New York. Like Bank Audi, BNP Paribas published its standard settlement instructions in the *Banker’s Almanac*. Before the relevant time frame, BNP Paribas Egypt advertised its “Correspondent Banking” service and identified “BNP Paribas SA” as its “correspondent” bank in “New York.” The standard settlement instructions likewise specified that BNP Paribas Egypt typically settled U.S. dollar wire transfers for its customers through its correspondent account with “BNP Paribas SA, New York.”

#### **Examples Of Defendants’ Transactions Through New York**

305. Plaintiffs are aware, on information and belief, of at least three transactions related to Defendants’ terrorist-financing scheme that Defendants specifically cleared through New York banks. These examples were found without discovery. The details of such transactions rest within Defendants’ exclusive control, so it is expected that many more examples will be available through discovery:

<b>Date</b>	<b>USD Amount</b>	<b>Originating Bank / Originator</b>	<b>Beneficiary Bank / Beneficiary</b>	<b>New York Correspondents</b>
8/25/2011	\$5,000,000	Citibank Dubai / Lafarge Cyprus	Bank Audi / LCS	Citibank New York JP Morgan Chase
8/25/2011	\$10,000,000	Citibank Dubai / Lafarge Cyprus	Bank Audi / LCS	Citibank New York JP Morgan Chase
10/23/2014	\$210,000	(Forthcoming) – (France) / Lafarge Cyprus	(Forthcoming) – Dubai / Tlass	(Forthcoming) – New York

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<sup>169</sup> Veronique Chocron, *Embargo Américain: La Banque Française S'attend à Payer une Amende* (American Embargo: The French Bank Expects to Pay a Fine), Les Echos (Nov. 21, 2013), <https://www.lesechos.fr/2013/11/embargo-america-in-la-banque-francaise-sattend-a-payer-une-amende-331866> (translated from French).

306. When Lafarge chose to make these payments through Lafarge Cyprus, it purposefully reached into New York to complete the transactions. For example, with the October 23, 2014 payment for Tlass’s negotiations with ISIS, Jolibois directed Tlass to issue a \$210,000 invoice from a Dubai shell company. On information and belief, Lafarge paid the invoice by directing its Parisian bank to initiate a wire transfer on behalf of Lafarge Cyprus, which sent funds through New York correspondent banks—including at least one in this District—to Tlass’s bank account in Dubai. On information and belief, and part and parcel with their efforts to conceal their conduct, Defendants knew and intended that this transaction would use the U.S. financial system and to clear through New York.<sup>170</sup>

307. Given that these transactions formed part of a common course of conduct involving U.S. dollars, Defendants likely used the same (or similar) New York banks to route other U.S. dollar transfers through New York. In general, customers and their banks follow similar routing processes to complete similar transactions in the same timeframes for the same currencies. Given that standard practice, and the other allegations above, including that the use of such transactions was the method chosen to conceal the conspiracy, these three examples are likely merely illustrative of Defendants’ broader practice of using New York banks to complete the U.S. dollar transactions in which they systematically engaged as part of the conspiracy. Indeed, it is implausible that Defendants used New York banks for just these three transfers and not any of the myriad similar transactions alleged herein.

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<sup>170</sup> The other two transactions, made in 2011, also supported LCS’s operations in Syria, including payments to Tlass. *See supra* ¶ 290.



### **Defendants' Use Of New York Banks Was Material To Their Scheme**

308. Using U.S. dollars made the conspiracy with ISIS easier and more efficient for participants, and more difficult for outsiders to detect. While ISIS was not always paid in U.S. dollars, this was ISIS's and Defendants' preferred currency.<sup>171</sup> Defendants' regular and deliberate use of U.S. dollar transactions, which in turn depended on their access to the New York banking system, was vital to the scheme's concealment and success. Their conscious choice to use U.S. dollars and New York banks offered at least three benefits.

309. First, using U.S. dollars and U.S. banks helped Lafarge conceal their payments from outside auditors, regulators, and law enforcement officials. Concealment was of paramount importance, given the stringent U.S. and international sanctions targeting Syria at the time and the illegality of payments to terrorists. Lafarge's Syrian operations faced significant financial scrutiny. The use of U.S. dollars helped Defendants avoid the scrutiny of LCS's external auditors. Transactions in Syrian pounds raised red flags among regulators, auditors, and bank-compliance departments, while U.S. dollars were associated with legitimate cross-border transactions, particularly when routed to companies outside Syria. Lafarge's executives thus "preferred" Lafarge's payments for ISIS be made in "bank transfer[s] in USD," to give its wire transfers the imprimatur of legitimacy associated with U.S. dollar transactions.

310. On information and belief, Lafarge funneled payments through a web of 54 different bank accounts (mostly at Bank Audi), including several Pescheux routed through a personal account he could keep off Lafarge's books. Using such a large number of accounts made it even more difficult for others to detect the scheme. The excessive number of bank accounts,

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<sup>171</sup> SOF ¶ 60.

which Defendants actively created, demonstrates a broader point: secrecy was vital, and Defendants were affirmatively involved in the financial machinations that enabled their scheme.

311. By routing their payments through New York, Defendants maximized the effectiveness of their terrorist funding. New York is the global hub of cross-border U.S. dollar transfers for good reason: Companies that wire their U.S. dollars through New York gain from the legitimacy, reliability, and speed offered by New York clearing. Transacting through other clearing centers in Tokyo, Hong Kong, Singapore, and Manila is theoretically possible, but requires extra cost and time and raises questions about why the transaction is exceptional—operational risks that New York clearing avoids.

312. Had Defendants attempted to route their U.S. dollar payments differently, the payments would have stood out as unusual, risking the very type of outside attention from auditors and regulators Defendants were striving to avoid. Defendants knew that attempting to route U.S. dollar transactions through non-New York centers was inadvisable. In or around 2012, U.S. sanctions began impeding the ability to route U.S. dollars in and out of Syria. On information and belief, New York banks began refusing to process transactions they knew were for LCS or other Syrian actors. In 2013, when Taleb complained about LCS's lack of prompt payment, LCS employees said that New York correspondent banks were refusing to process their transactions and tried to find other banks to complete the payment, creating further delays and expense.

313. In response, Defendants structured transactions that would use the New York banking system to appear as though they were going somewhere other than Syria, for example through the LMEA Account in Egypt. Defendants told Tlass to create a Dubai company for Lafarge Cyprus's payment to avoid Syrian contacts, and he did so. These bank account locations

enabled Defendants to route their U.S. dollar payments through New York banks but still get money into Syria, and it was faster and more reliable than the alternatives.

314. Second, transacting in U.S. dollars protected Defendants and their agents from foreign-exchange risk and the plummeting value of the Syrian pound. At the beginning of 2012, the Syrian pound was trading against the U.S. dollar at roughly 54:1. By the end of 2014, it had depreciated to roughly 180:1—losing more than two-thirds of its value. This made Syrian pounds unappealing for any long-term deal. Indeed, Tlass demanded that Lafarge pay his monthly fee in U.S. dollars in part because the Syrian pound was losing value so rapidly as to become effectively worthless.

315. ISIS's and ANF's preferred currency was also the U.S. dollar. U.S. currency made the conspiracy flow. Real-time public reports linked ISIS's fundraising and recruiting success to its stockpile of U.S. dollars, which is how ISIS fighters wanted to be paid. As Business Insider reported in 2015:

According to [an ISIS defector], a large number of people are joining ISIS because they need money. After joining [ISIS], people are paid in US dollars instead of Syrian [pounds] . . . ISIS members receive additional incentives to fight for the group. "I rented a house, which was paid for by ISIS," Abu Khaled, who worked for ISIS's internal-security forces and "provided training for foreign operatives," [said]. "It cost \$50 per month. [ISIS] paid for the house, the electricity. Plus, I was married, so I got an additional \$50 per month for my wife. If you have kids, you get \$35 for each. If you have parents, they pay \$50 for each parent. This is a welfare state."

316. ISIS preferred U.S. dollars for goods it sold and to pay its fighters. According to the Independent, ISIS "promoted the idea that it was hitting the US economy by issuing its own currency but the organisation on the ground is doing exactly the opposite, having built a financial system entirely dependent on the US dollar."

317. For the reasons above, had Defendants not chosen to reach into New York and use New York banks to transact in U.S. dollars, their scheme of sending payments to ISIS would have been less effective, more expensive, and harder to conceal. Hiding it meant it could continue and grow.

**Defendants' Use Of New York Banks Was Purposeful, Knowing, And Intentional**

318. Defendants' use of New York banks was deliberate. U.S. dollars were critical to Defendants' scheme with ISIS and its intermediaries. Needing a safe, effective, and opaque means to transfer their cash, Defendants purposefully chose New York.

319. Defendants' executives were aware of how Defendants' money was transferred quickly and effectively to and from LCS. A Lafarge email discussing its June 2014 loan to LCS demonstrates the degree of that involvement. In that email, Lafarge's treasury managers discussed the need for Lafarge (through Lafarge Cyprus) to "increase its outstanding subordinated shareholder loan" to LCS by "US\$12m to give LCS a small buffer" to cover its ongoing U.S. dollar shortfalls. In that discussion, Lafarge employees demonstrated an awareness of how to route the money. As the same email explained, the wire-transfer "process must start in the few coming days due to time needed to channel the funds to Syria through Lebanon, to lower the risk of cash being trapped by banks' compliance policies linked to sanctions affecting Syria." The reference to "Lebanon," on information and belief, referred to LCS's account at Audi Bank Lebanon. Lafarge was thus aware of Bank Audi's correspondent-banking policies, and it sought to guard against the risk that using New York correspondent accounts would expose it to prosecution for violating U.S. sanctions.

320. The steps Defendants took to conceal their transactions confirm that their use of New York banks was deliberate, including by using an "LMEA Account" in Egypt and ordering

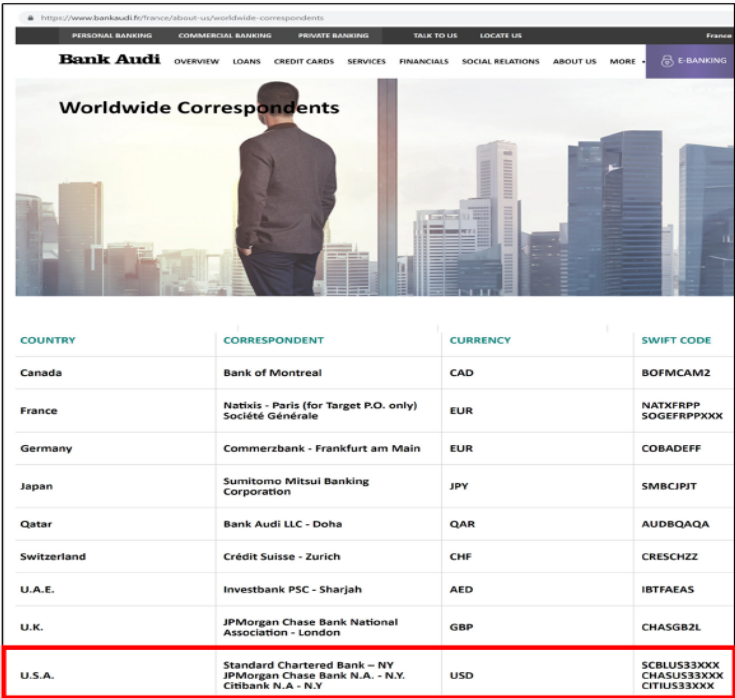
Tlass to open an account in Dubai. Both of these accounts were intended to trick U.S. banks into completing transfers to circumvent U.S. sanctions against transactions in Syria and to conceal payments from French auditors and law enforcement officials. They made sense only if Defendants were actively seeking to use the New York clearing system.

321. Defendants' executives also regularly and purposefully received specific transaction confirmations alerting them to the particular New York correspondent and intermediary banks that routed their transactions. On information and belief, these confirmations typically took the form of SWIFT MT103 messages. SWIFT, which stands for the Society for Worldwide Interbank Financial Telecommunication, is the standard communications system for sending cross-border wire-transfer messages between financial institutions. An MT103 (or Message Type 103) is a standard message confirming the details of an executed transaction. Fields 53, 54, and 56 in an MT103 typically disclose the correspondent and intermediary banks involved. On information and belief, Lafarge (acting through Lafarge Cyprus) and LCS regularly requested and received SWIFT confirmations from their banks notifying them of the New York banks involved in clearing their transfers, as part of Defendants' process of approving the transactions. On information and belief, Pescheux specifically approved at least one of the 2011 New York-cleared transactions alleged above, after personally requesting the SWIFT confirmation disclosing that JPMorgan Chase's and Citibank's New York branches were involved in routing the transaction.

322. Defendants paid and were therefore alerted to banking fees for the New York banks that cleared their transactions. Correspondent and intermediary banks typically charge a fee for each wire transfer that they process, which can be paid in three ways; the specific payment mechanism is typically reported at Field 71A of the SWIFT MT103. Option one—denoted by “OUR”—has the originator cover the fees separately, on top of the amount transferred. For

example, on information and belief, the SWIFT message for the \$10 million U.S. dollar upstream payment denoted above, *supra* ¶ 291, used the “OUR” option in Field 71A, meaning that Lafarge Cyprus separately paid JP Morgan Chase’s fees to compensate it for its New York clearing services. Option two, denoted by “BEN,” covers the fees by deducting them from the amount transferred. Option three, denoted by “SHA,” is a mix of the two. In each scenario, the sender wires the money to the intermediary or correspondent bank to compensate that bank for the service of processing the transaction. Thus, when Defendants effectuated U.S. dollar transactions to pay terrorists and their intermediaries, they knowingly elected how to pay those New York banks for the service. Defendants—not their originating banks—covered the payment of these fees into New York.

323. Defendants’ banks publicly advertised that they routed U.S. dollar transactions through New York on their websites. Bank Audi’s public marketing also alerted Defendants to the New York connection. Specifically, Bank Audi’s “Worldwide Correspondents” website disclosed that its U.S. dollar transactions relied on banks in the “U.S.A.” and “N.Y.”:



COUNTRY	CORRESPONDENT	CURRENCY	SWIFT CODE
Canada	Bank of Montreal	CAD	BOFMCAM2
France	Natixis - Paris (for Target P.O. only) Société Générale	EUR	NATXFRPP SOGEFRPPXXX
Germany	Commerzbank - Frankfurt am Main	EUR	COBADEFF
Japan	Sumitomo Mitsui Banking Corporation	JPY	SMBCJPIT
Qatar	Bank Audi LLC - Doha	QAR	AUDBQAQA
Switzerland	Crédit Suisse - Zurich	CHF	CRESCHZZ
U.A.E.	Investbank PSC - Sharjah	AED	IBTFAEAS
U.K.	JPMorgan Chase Bank National Association - London	GBP	CHASGB2L
U.S.A.	Standard Chartered Bank - NY JPMorgan Chase Bank N.A. - N.Y. Citibank N.A. - N.Y.	USD	SCBLUS33XXX CHASUS33XXX CITRUS33XXX

324. Even the Syrian government alerted Defendants that their U.S. dollar transactions went through New York. In February 2006, the Syrian government issued Circular Number 810/15, requiring that all foreign currency transactions for the government that had previously been denominated in U.S. dollars instead occur in Euros, specifically to avoid U.S. dollar clearing by New York banks. That decision, of which Defendants were aware, reflected the widespread understanding in Syria that any U.S. dollar transaction goes through U.S. banks.

325. Client alerts published by Lafarge's outside counsel also alerted Defendants that their transactions used the U.S. banking system. While Shearman & Sterling LLP was advising Lafarge, it published a non-privileged client alert warning all its clients, including Lafarge, that the United States Department of Justice and Securities and Exchange Commission's guidance indicated an "expansive assertion of territorial jurisdiction over non-U.S. defendants," including over "overseas financial transactions involving US dollars," because "virtually all such transactions clear through correspondent banking accounts in the U.S." While Baker & McKenzie represented Lafarge, it alerted its clients about the same guidance, namely that "a wire transfer from or to a U.S. bank or otherwise using the U.S. banking system" may create jurisdiction in the U.S. based on the "use of correspondent bank accounts."

326. Finally, decades of media reports about CHIPS and correspondent banking also alerted Defendants that their U.S. dollar transactions used New York banks, as far back as articles in the *American Banker* in 1989,<sup>172</sup> *Los Angeles Times* in 1991,<sup>173</sup> *Australian Financial Review* in 2002,<sup>174</sup> *The Mail on Sunday* in 2004 (quoting a source as saying "[c]urrently, if you want to pay

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<sup>172</sup> *Glossary Of Computer Technology Terms*, *American Banker*, Feb. 1, 1989, at 10, 1989 WLNR 1319450.

<sup>173</sup> Glas Frantz, *Lax Rules Blamed in Bank Schemes*, *Los Angeles Times* (Apr. 28, 1991), 1991 WLNR 3887729.

<sup>174</sup> John Breusch, *US Patriot Law Could Involve Local Banks*, *Australian Financial Review* (Feb. 12, 2002), 2002 WLNR 15725873.

United States dollars from bank A to bank B, that transaction has got to go via New York.”),<sup>175</sup> *Newsweek International* in 2006,<sup>176</sup> *The Economist* in 2013,<sup>177</sup> and *Gulf News* in 2014.<sup>178</sup> Thus, Lafarge officials, who ran the largest and most sophisticated construction material multinational in the world, advised by top U.S. law and consultancy firms, were aware of this issue, which had become common knowledge through the media.

**b. Defendants Used U.S.-Based Email Providers To Veil Their Terrorist-Financing Scheme**

327. To evade detection of their conspiracy with terrorist groups, Defendants also reached into the United States to use U.S.-based email services, reaping the benefit of their email providers’ U.S. presence. Those U.S.-driven benefits also materially contributed to Defendants’ scheme and enhanced their ability to pay terrorists.

328. Lafarge’s executives were explicitly instructed by their counsel to use personal email addresses rather than their corporate accounts. These email addresses were primarily Gmail accounts. On information and belief, Defendants sent and received hundreds of scheme-related communications through these and other such accounts:

Account Owner	Role of Account Owner	Email Address
Bruno Pescheux	CEO of LCS until July 2014	brunopescheux@gmail.com
Firas Tlass	Defendants’ agent and intermediary who paid ISIS on their behalf	Firastlass01@gmail.com
Mamdouh al-Khaled	LCS Purchasing Manager	Mamdouh.lafarge@gmail.com

<sup>175</sup> John Mushayavanhu (Vice Chairman of Bankers Association of Zimbabwe), *quoted in Zimbabwe: Local Forex Clearance System Expected Soon*, allAfrica (Apr. 10, 2009), <https://allafrica.com/stories/200904100724.html>.

<sup>176</sup> Christian Caryl et al., *Pocketbook Policing: Washington Has Finally Found A Strategy That Is Putting Real Pressure On The Regime—Going After Its Sources Of Cash, All Across The World*, *Newsweek Int’l* (Apr. 10, 2006), 2006 WLNR 5632771.

<sup>177</sup> *Economist*, *Digital Currencies: A New Specie*, *Economist* (Apr. 13, 2013), 2013 WLNR 8890628.

<sup>178</sup> Babu Das Augustine, *UAE To Sign FATCA Agreement Soon*, *Gulf News* (Mar. 13, 2014), 2014 WLNR 6929583.



Hassan al-Saleh	LCS Plant Manager	Hassan.cement65@gmail.com
Ahmad Jamal	ISIS representative who supplied materials to LCS	Ahmad.jamal1966@gmail.com

329. Carrying out a criminal conspiracy via Gmail, rather than corporate email, matched standard practice among terrorists and their funders, who rely on cheap and easily available technologies that are anonymous, such as Gmail. Defendants’ use of Gmail relied on extensive U.S. infrastructure. Google operated the majority of its data centers in the United States, which enabled Defendants’ conspiracy-related emails to reach their destinations securely and reliably, including through regular backups, and to be concealed from Defendants’ auditors and French law enforcement authorities.

330. Defendants and their agents agreed to numerous U.S. contacts by agreeing to use and regularly using their U.S.-based Gmail accounts. They reached into the United States to make a contract with a U.S. company, by agreeing to Google’s Terms of Service, which in 2013 made clear that Gmail was “provided by Google, Inc. (“Google”), located at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States” and regulated by the “laws of California, U.S.A. . . .” They also sent and received data and services from Google in the United States. Thus, when Defendants signed up for Gmail and used it to carry out their scheme, they knew they were paying an American company for the American service they were using. Rather than sending a wire transfer delivering cash to their U.S. counterparty, they delivered their data.

331. Because Gmail is based in the United States and operates under U.S. law, it is more difficult for foreign prosecutors and regulators to access. U.S. law at the time constrained releases of customer data to foreign governments, making the evidence nearly impossible for European law enforcement to access. Had Defendants chosen to use non-U.S.-based email, such as their corporate account or a free European email service, their communications would have been more

susceptible to access by French regulators and law enforcement, and this may have heralded the end of the scheme.

**c. Defendants Purposefully Entered Into A Conspiracy With ISIS, Pursuant To Which ISIS Engaged In Acts That Targeted The United States**

332. It is undisputed that Defendants conspired with ISIS via intermediaries by means of conduct and agreements impacting the United States. That is the primary basis for Lafarge and LCS's guilty plea.

333. Defendants used ISIS's grip on territory to their benefit: ISIS was a good business partner for Lafarge. And Lafarge's willingness to pay ISIS gave ISIS a unique opportunity to increase market share, expand operations, and commit more terrorist attacks. Lafarge gained the ability to do what it had not done before: partner with an armed force that ruled by force, not law, and was willing to neutralize the competition. This allowed Lafarge to increase the profits that it would then share with its terrorist partner.

334. For the co-conspirators to continue to profit, ISIS needed to remain in control, expand its reach over territories and markets, and continue to tax and intimidate LCS's competitors. ISIS's constant violence, in turn, backed up its credible threat. Violence was crucial to the racket, because it made the population believe ISIS's willingness to back up its threats. When Defendants participated in ISIS's extortion and protection racket, it joined and relied upon a conspiracy that was explicit in its purpose of making money through the perpetuation of terrorist violence—even more the case when Defendants entered into a direct revenue-sharing agreement with ISIS.

335. Unsurprisingly, and in line with its express statements, ISIS engaged in numerous overt acts both in and expressly aimed at the United States to further its terrorist aims. ISIS's global ambition and historical roots in Al-Qaeda meant that targeting the United States and

American citizens was one of its principal goals. These attacks ramped up as Defendants increased their payments, holding Americans captive and killing American hostages in gruesome video messages broadcast around the world and directed explicitly to the United States. As Deputy Attorney General Monaco stated in connection with Lafarge and LCS's guilty plea, during Defendants' conspiracy, the rest of "the world watched in horror as ISIS murdered innocent journalists and aid workers," inflicting "unimaginable pain and suffering" on "American families whose loved ones were brutally murdered by ISIS."

336. Defendants only redoubled their efforts to work with ISIS as American forces conducted air strikes against ISIS to stop its siege of Yazidis in August 2014 and after ISIS publicly beheaded American journalists. ISIS publicly celebrated its horrific acts and was open about the fact that, before and during the conspiracy, it was targeting the United States. ISIS leaders "threatened America and our allies," according to President Obama, who announced this after ordering air strikes to counter ISIS in Iraq and Syria to "save the lives of thousands of innocent men, women, and children," including Yazidis.

337. ISIS was outspoken about its intent to commit acts of terrorism against the United States, as well as its intentional recruitment from the United States. In July 2012, Al-Baghdadi, ISIS's founder and leader, threatened to strike at the "heart" of America, proclaiming that the United States "will soon witness how attacks will resound in the heart of your land, because our war with you has now started." In January 2014, Al-Baghdadi announced to Americans: "Soon we will be in direct confrontation." And in June 2014, Al-Baghdadi threatened Americans: "You should know, you defender of the cross, that getting others to fight on your behalf will not do for you in Syria as it will not do for you in Iraq," and that "soon enough, you will be in direct confrontation—forced to do so, God willing. And the sons of Islam have prepared themselves for

this day. So wait, and we will be waiting, too.” The threat to U.S. citizens was well known. On June 27, 2014, U.S. senators observed publicly that “[t]he conflict in Syria has deteriorated and spread so dangerously that it is now the source of direct threats to the United States” and that “[t]he leader of ISIS, Abu Bakr al-Baghdadi, has already stated his ambitions to attack the U.S. homeland.”

338. The threats to American citizens proved all too real. In August 2014, ISIS broadcasted its beheading of U.S. journalist James Foley and threatened the life of Steven Sotloff if President Obama did not end military operations in Iraq. Tellingly, the beheading videos of both Foley and Sotloff were titled “Message to America” and “A Second Message to America,” respectively. ISIS stated that its killing of Sotloff was “the consequence of arrogance and transgression which all US citizens are responsible for” and “retaliation for the numerous Muslims killed in Iraq by the U.S. American airstrikes.” Defendants nonetheless pressed ahead with making payments to ISIS.

339. Likewise, in October 2014, ISIS published in its English-language publication an article entitled “Indeed, Your Lord is Ever Watchful,” in which it explicitly spelled out ISIS’s anti-American objectives, stating, for example:

O America, O allies of America, and O crusaders, know that the matter is more dangerous than you have imagined and greater than you have envisioned . . . O Obama, O mule of the Jews, you are vile. You are vile. You are vile. And you will be disappointed, Obama. Is this all you were capable of doing in this campaign of yours? Is this how far America has reached in incapacity and weakness? Are America and its allies from amongst the crusaders and atheists unable to come down to the ground? . . .

O Allah, America, France, and their allies transgressed against us. They came with their legions to fight us out of their enmity for your religion . . . We have no way to deal with their airplanes. O Allah, you have said what is true, ‘So do not weaken and do not grieve, and you will be superior if you are [true].’

340. A leading terrorism expert testified before the Subcommittee on Counterterrorism and Intelligence of the House Committee on Homeland Security that the “U.S. military has ostensibly become a primary target for the Islamic State.”

341. The United States’ status as global superpower meant that victimizing Americans and killing American soldiers was an especially effective way to convey ISIS’s authority. Brutally killing American citizens “send[s] a message to American . . . people,” and the world, of ISIS’s power.<sup>179</sup>

342. Given the United States’ unique military ability, ISIS’s attacks on U.S. citizens and their families, including Plaintiffs, in Syria, Iraq, and elsewhere were an important part of Lafarge’s conspiracy with ISIS. Attacks on American interests, or that enmeshed the United States in further conflict, had symbolic value and allowed ISIS to tout that it could beat the most powerful military in the world.

343. The United States has convicted ISIS terrorists based on their targeting of the United States. On September 2, 2021, former British citizen Alexanda Amon Kotey pleaded guilty in the Eastern District of Virginia to an eight-count indictment for his participation in ISIS’s hostage-taking and terrorist activities, which consisted of one count of conspiracy to commit hostage taking resulting in death; four counts of hostage taking resulting in the deaths of four Americans (Foley, Sotloff, Kayla Mueller, and Abdul-Rahman (Peter) Kassig); one count of conspiracy to murder U.S. citizens outside of the United States; one count of conspiracy to provide material support or resources to terrorists resulting in the deaths of U.S., British, and Japanese nationals; and one count of conspiracy to provide material support or resources to a designated

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<sup>179</sup> Daniel Byman, *Al Qaeda, The Islamic State, And The Global Jihadist Movement: What Everyone Needs To Know* 175-77 (Oxford Univ. Press 2015).

FTO resulting in the deaths of U.S., British, and Japanese nationals. Kotey was sentenced to eight concurrent terms of life imprisonment on April 29, 2022.

344. On April 14, 2022, a federal jury in the Eastern District of Virginia convicted Kotey's co-conspirator, former British citizen El Shafee Elsheikh, for his participation in the same ISIS terrorism scheme. Elsheikh was the highest-ranking ISIS fighter to have ever faced a jury trial in the United States, following leadership in a scheme that ultimately involved the captivity of at least 26 hostages in Syria, including the four American citizens who were killed. According to the DOJ, these Americans were subjected to a "prolonged pattern of physical and psychological violence . . . that was meant as an effort to subdue the hostages. These actions were also intended to compel the victims' family members and their governments to pay large monetary ransoms for their release, in addition to compelling the U.S. government and other governments to agree to other terms and conditions for the victims' return." Thirty-five witnesses at the trial presented evidence covering the period from November 2012 through February 7, 2015 of Elsheikh's participation in torturing the hostages, including a Yazidi woman who was held as a slave alongside Mueller. Elsheikh was sentenced to eight concurrent terms of life imprisonment without the possibility of parole on August 19, 2022.

345. Other ISIS members have been tried and convicted in this District. For example, in 2013, Mirsad Kandic traveled from Brooklyn to a city outside of Aleppo, Syria to work directly with ISIS leadership. Kandic managed ISIS social media accounts and recruited thousands to ISIS, including from New York. In 2022, Kandic was convicted of five counts of providing material support to ISIS and one count of conspiracy to do the same. Likewise, Ruslan Maratovich Asainov, a U.S. citizen from Bay Ridge, New York was convicted in the Eastern District of New York for providing material support to ISIS. Asainov fought with ISIS as a sniper from 2013 until he

surrendered in 2019. He ran a private chat group for ISIS members to sell and trade weapons called “Khilafah (Caliphate) Market,” which included Raqqa governor Abu Luqman as a member. *See supra* Part VI(d).

346. ISIS also reached into the United States to further the conspiracy. Al-Qaeda in Iraq, ANF’s and ISIS’s predecessor, threatened the United States numerous times, as did ISIS leaders. ISIS also recruited heavily from the United States, including from this District, drawing approximately 300 U.S. citizens who joined or attempted to join its ranks, with a small number of them ascending to senior positions within the terrorist group. Its members sent and received money from U.S. citizens for attacks in the U.S., Syria, and Iraq. ISIS propaganda officials tried to use events in Ferguson, Missouri and Baltimore, Maryland as recruiting tools.

347. Defendants knew all of this, as confirmed by their emails. “[W]e should not forget that ISIS is a terrorist movement,” Jolibois admonished Herrault in the course of a negotiation.<sup>180</sup> Defendants were also aware that the U.S. government had designated ANF and ISIS as FTOs. Defendants were familiar with the history of Al-Qaeda in Iraq and around the world, through their security consultant and intermediaries such as Tlass. Attacks on Americans and others took place while Lafarge was actively handing millions of dollars to ISIS and were an easily foreseeable—and indeed inevitable—result of entering into a deal with a group whose sole purpose was to subject non-Muslims to brutal terrorist rule and, in the case of Yazidis, to genocidal destruction.

348. ISIS’s overt acts targeted the United States and U.S. citizens. Lafarge bought protection from and entered a complex conspiracy with ISIS and its intermediaries, with the awareness that they were terrorist-classified groups. Lafarge conspired with full knowledge of their terrorist acts, including their targeting of the United States and U.S. citizens, in order to

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<sup>180</sup> SOF ¶ 82.

control markets and increase profits. As a result of the conspiracy between Defendants, intermediaries, and ISIS, ISIS's overt acts targeting the United States and U.S. citizens, including Plaintiffs and their loved ones, are attributable to Defendants.

#### **VIII. LAFARGE AND LCS PLEAD GUILTY TO CONSPIRING TO PROVIDE MATERIAL SUPPORT TO TERRORISTS**

349. On October 18, 2022, the DOJ announced that Lafarge and LCS pleaded guilty to a one-count criminal information in the Eastern District of New York charging them with conspiring to provide material support to ISIS and ANF in violation of 18 U.S.C. § 2339(B)(a)(1). It was the first time the DOJ had ever brought such charges against a company.

350. U.S. District Judge William F. Kuntz II sentenced Lafarge and LCS to terms of probation and to pay financial penalties, including criminal fines and forfeiture totaling \$777.78 million. At the conclusion of the sentencing hearing, Judge Kuntz said: "This case impacts global communities. This case impacts the national security of the United States. This case impacts the victims of terrorist acts perpetrated by ISIS and ANF. And ultimately, this case is about what Lafarge and LCS did that brought us here today."

351. Assistant Attorney General Matthew G. Olsen of the DOJ's National Security Division said: "The defendants routed nearly six million dollars in illicit payments to two of the world's most notorious terrorist organizations—ISIS and al-Nusrah Front in Syria—at a time those groups were brutalizing innocent civilians in Syria and actively plotting to harm Americans." He continued: "There is simply no justification for a multi-national corporation authorizing payments to designated terrorist organizations."

#### **IX. HARM TO PLAINTIFFS' PERSONS, PROPERTY, AND FAMILY AS A RESULT OF ISIS'S TERRORIST ATTACKS**

352. ISIS's terrorism campaign against the Yazidis in August 2014 caused unimaginable pain and suffering to the Yazidi community all around the world. Left with nothing in Iraq, many



Yazidis who were directly victimized by ISIS immigrated to the United States on Special Immigrant Visas for helping the U.S. military, principally as interpreters. Others were granted refugee status on the basis of persecution or a well-founded fear of persecution on account of race, religion, nationality, or membership in a particular social group, and have since become citizens. Yazidis who had come to the United States prior to the genocide watched in horror as their families fled for their lives. These Yazidis, who are all U.S. citizens, have experienced extreme trauma, lost their family members, lost the jobs and businesses they used to support extended families, and lost their homes.

**Nadia Murad**<sup>181</sup>

353. Plaintiff Nadia Murad is a citizen of the United States and domiciled in the District of Columbia.

354. Plaintiff Nadia Murad has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

355. In particular, on or about August 3, 2014, during ISIS's invasion of Sinjar, Iraq, ISIS killed Plaintiff Nadia Murad's family, including her mother, brothers, and cousins, in mass executions. Three of Plaintiff Nadia Murad's brothers and one nephew were shot but survived the massacre and were able to escape. ISIS captured and enslaved Plaintiff Nadia Murad and her female relatives, including her sisters, nieces, and sisters-in-law. During captivity, Plaintiff Nadia Murad was physically, mentally, and sexually abused by twelve different ISIS militants until she was able to escape. Two of Plaintiff Nadia Murad's nieces died in ISIS's captivity. Plaintiff Nadia Murad's sisters were able to escape from ISIS, but one of her sisters-in-law and one of her nieces are still missing. ISIS also captured Plaintiff Nadia Murad's nephews, one of whom is still missing.

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<sup>181</sup> Official name Nadia Taha.

356. ISIS looted and destroyed Plaintiff Nadia Murad's real and personal property.

357. As a result of ISIS's invasion, Plaintiff Nadia Murad has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Suad Ket**

358. Plaintiff Suad Ket is a citizen of the United States and domiciled in the state of Arizona.

359. Plaintiff Suad Ket has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq

360. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Suad Ket, who was pregnant at the time, fled to a nearby village with her husband and his family. ISIS surrounded the village and captured Plaintiff Suad Ket, her husband, and his family, and separated them. Plaintiff Suad Ket gave birth after being captured and was moved from place to place and was taken to Raqqa, Syria sold. During captivity, Plaintiff Suad Ket was held by three different ISIS militants and was raped, abused, and tortured. Plaintiff Suad Ket now suffers from serious mental and physical health issues, including seizures, as a result of the head injuries she incurred while in captivity. Plaintiff Suad Ket's husband and her brother-in-law are still missing. Her family, including her mother and siblings, were held captive for one week when ISIS invaded until they were able to flee to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. ISIS killed her uncle, aunt, and cousin.

361. ISIS looted and destroyed Plaintiff Suad Ket's real and personal property.

362. As a result of ISIS's invasion, Plaintiff Suad Ketî has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Jane Doe and Janet Doe**<sup>182</sup>

363. Plaintiffs Jane Doe and Janet Doe are citizens of the United States. Plaintiffs Jane Doe and Janet Doe are sisters.

364. Plaintiffs Jane Doe and Janet Doe have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

365. In particular, on or about August 3, 2014, during ISIS's invasion of Sinjar, Iraq, ISIS killed Plaintiffs Jane Doe and Janet Doe's family, including their grandfather, father, uncles and cousins, in mass executions. ISIS captured and enslaved Plaintiffs Jane Doe and Janet Doe and their female relatives, including their aunts and cousins. During captivity, Plaintiffs Jane Doe and Janet Doe were physically, mentally, and sexually abused by different ISIS militants until they were able to escape after about a year in captivity. Plaintiffs Jane Doe and Janet Doe's stepmother and younger siblings were also captured by ISIS, and held separately until they were able to escape.

366. ISIS looted and destroyed Plaintiffs Jane Doe and Janet Doe's real and personal property.

367. As a result of ISIS's invasion, Plaintiffs Jane Doe and Janet Doe have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

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<sup>182</sup> Names and state of domicile have been withheld to protect plaintiffs.

**Mahya Alqasim and Fadi Khaleel**

368. Plaintiffs Mahya Alqasim and Fadi Khaleel are citizens of the United States and domiciled in the state of New York. Plaintiff Mahya Alqasim is Plaintiff Fadi Khaleel's mother.

369. Plaintiffs Mahya Alqasim and Fadi Khaleel have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

370. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Mahya Alqasim fled towards Sinjar Mountain with her husband and their children, including Plaintiff Fadi Khaleel. As they were fleeing, they were captured by ISIS and taken to Syria. ISIS killed Plaintiff Mahya Alqasim's husband. Plaintiffs Mahya Alqasim and Fadi Khaleel, along with Plaintiff Mahya Alqasim's other children, were held in captivity for approximately nine months. While they were in captivity, Plaintiff Mahya Alqasim and her children were moved to various locations, including Kocho and Mosul, and witnessed other Yazidis being killed, dying by suicide, and being sold into slavery. Plaintiff Mayha Alqasim hid her children and tried to make herself look physically unattractive to avoid being sold into slavery. After approximately nine months, Plaintiff Mayha Alqasim and her children were able to escape from ISIS captivity. Plaintiff Fadi Khaleel escaped first, by jumping out of a building window, and the rest of the family then fled through the front door. ISIS killed Plaintiff Mayha Alqasim's brother, and her stepfather died from heart complications after hearing the news of her brother's death.

371. ISIS looted and destroyed Plaintiffs Mahya Alqasim and Fadi Khaleel's real and personal property.

372. As a result of ISIS's invasion, Plaintiffs Mahya Alqasim and Fadi Khaleel have experienced economic loss, severe mental anguish, extreme emotional pain and suffering, loss of property, and/or loss of their family's society and counsel.

**Vinal Halaja**

373. Plaintiff Vinal Halaja is a citizen of the United States and domiciled in the state of Arizona.

374. Plaintiff Vinal Halaja has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

375. In particular, on or about August 3, 2014, during ISIS's invasion of Sinjar, Iraq, ISIS captured Plaintiff Vinal Halaja, her mother, brothers, sisters, and cousins. Plaintiff Vinal Halaja's sister was sold when they were in Tel Afar, and another of Plaintiff Vinal Halaja's sisters and her sister-in-law were taken to Syria to be sold. Plaintiff Vinal Halaja managed to stay with her mother and avoid being sold by cutting off her hair and acting as if she was mentally ill every time ISIS came to take women to sell. Eventually, Plaintiff Vinal Halaja and her mother were released. Plaintiff Vinal Halaja's sisters have since managed to escape from ISIS's captivity. Her cousins were taken by ISIS and forced to convert to Islam. ISIS also captured two of Plaintiff Vinal Halaja's uncles. Her brothers are still missing.

376. ISIS looted and destroyed Plaintiff Vinal Halaja's real and personal property.

377. As a result of ISIS's invasion, Plaintiff Vinal Halaja has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property, and/or loss of her family's society and counsel.

**Ezzat Kolo**

378. Plaintiff Ezzat Kolo is a citizen of the United States and domiciled in the state of Georgia.

379. Plaintiff Ezzat Kolo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

380. In particular, on or about August 3, 2014, during ISIS's invasion of Sinjar, Iraq, ISIS captured Plaintiff Ezzat Kolo's parents, brothers, and their families. A number of Plaintiff Ezzat Kolo's family members were transferred to Syria. ISIS released Plaintiff Ezzat Kolo's parents, but his brothers, nieces, and nephews were held in captivity. Plaintiff Ezzat Kolo's other siblings fled to Sinjar Mountain when ISIS invaded their hometown and were trapped there until they were able to escape to Kurdistan.

381. ISIS looted and destroyed Plaintiff Ezzat Kolo's real and personal property.

382. As a result of ISIS's invasion, Plaintiff Ezzat Kolo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Nori Khalaf**

383. Plaintiff Nori Khalaf is a citizen of the United States and domiciled in the state of Nebraska.

384. Plaintiff Nori Khalaf suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

385. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nori Khalaf and his family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. While fleeing, Plaintiff Nori Khalaf was held at gunpoint by ISIS. ISIS captured and held Plaintiff Nori Khalaf's cousin and her daughter for three years.

386. ISIS looted and destroyed Plaintiff Nori Khalaf real and personal property.

387. As a result of ISIS's invasion, Plaintiff Nori Khalaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Eedo Osman and Hakim Osman**

388. Plaintiffs Eedo Osman and Hakim Osman are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Eedo Osman is the father of Plaintiff Hakim Osman.

389. Plaintiffs Eedo Osman and Hakim Osman have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

390. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Eedo Osman and Hakim Osman fled to Kurdistan with Plaintiff Eedo Osman's wife, children, and their families (Plaintiff Hakim Osman's mother, siblings, and their families). ISIS captured Plaintiff Eedo Osman's brother, sister-in-law, and their children (Plaintiff Hakim Osman's uncle, aunt, and their children). Plaintiff Eedo Osman's brother and his nephew are still missing. Plaintiff Eedo Osman suffers from diabetes and high blood pressure following the invasion. Plaintiff Hakim Osman now suffers from nightmares and flashbacks following the invasion.

391. ISIS looted and destroyed Plaintiffs Eedo Osman and Hakim Osman's real and personal property.

392. As a result of ISIS's invasion, Plaintiffs Eedo Osman and Hakim Osman have experienced economic loss, severe mental anguish, extreme emotional pain and suffering, loss of property, and/or loss of their family's society and counsel.

**Khidhir Ido and Khokhy Omer**

393. Plaintiffs Khidhir Ido and Khokhy Omer are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Khidhir Ido and Khokhy Omer are married.

394. Plaintiffs Khidhir Ido and Khokhy Omer have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

395. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khidhir Ido fled to Sinjar Mountain with his family, including his parents and some of his siblings, where they were trapped until they were able to escape to Kurdistan. Plaintiff Khokhy Omer separately fled to Sinjar Mountain with her and Plaintiff Khidhir Ido's infant daughter, her parents, siblings, and their families. During the escape, Plaintiffs Khidhir Ido and Khokhy Omer lost contact with each other for several days, and they were only reunited in Kurdistan. Plaintiffs Khidhir Ido and Khokhy Omer's infant daughter starved and developed serious injuries while on the mountain for which she received hospital treatment. Plaintiffs Khidhir Ido and Khokhy Omer's daughter still suffers from her injuries. Plaintiff Khokhy Omer's father passed out as a result of starvation while on Sinjar Mountain.

396. ISIS looted and destroyed Plaintiffs Khidhir Ido and Khokhy Omer's real and personal property.

397. As a result of ISIS's invasion, Plaintiffs Khidhir Ido and Khokhy Omer have experienced economic loss, severe mental anguish, extreme emotional pain and suffering, loss of property, and/or loss of their family's society and counsel.

**Samea Merza, Salema Merza, and Salim Merza**

398. Plaintiffs Samea Merza, Salema Merza, and Salim Merza are citizens of the United States. Plaintiff Samea Merza is domiciled in the state of Washington, and Plaintiffs Salema Merza and Salim Merza are domiciled in the state of Nebraska. Plaintiffs Samea Merza, Salema Merza, and Salim Merza are siblings.

399. Plaintiffs Samea Merza, Salema Merza, and Salim Merza have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

400. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Samea Merza fled to Kurdistan with her mother and siblings. Plaintiffs Salema



Merza and Salim Merza, who were in Kurdistan at the time of the invasion, fearfully followed their family's journey as they fled. ISIS captured over sixty of Samea Merza, Salema Merza, and Salim Merza's relatives, most of whom are still missing. Their uncle died on Sinjar Mountain.

401. ISIS looted and destroyed Plaintiffs Samea Merza, Salema Merza, and Salim Merza's real and personal property.

402. As a result of ISIS's invasion, Plaintiffs Samea Merza, Salema Merza, and Salim Merza have experienced economic loss, severe mental anguish, extreme emotional pain and suffering, loss of property, and/or loss of their family's society and counsel.

**Nawaf Sulaiman, Baslan Allaw, Ghandi Allaw, Paris Allaw, and Sulaiman Allaw**

403. Plaintiffs Nawaf Sulaiman, Baslan Allaw, Ghandi Allaw, Paris Allaw, and Sulaiman Allaw are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Nawaf Sulaiman is the father of Plaintiffs Baslan Allaw, Ghandi Allaw, Paris Allaw, and Sulaiman Allaw.

404. Plaintiffs Nawaf Sulaiman, Baslan Allaw, Ghandi Allaw, Paris Allaw, and Sulaiman Allaw have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

405. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nawaf Sulaiman's family, including his daughter and siblings, (Plaintiffs Baslan Allaw, Ghandi Allaw, Paris Allaw, and Sulaiman Allaw's sister; aunts; and uncles) fled their homes. Plaintiffs Nawaf Sulaiman, Baslan Allaw, Ghandi Allaw, Paris Allaw, and Sulaiman Allaw fearfully followed their family's journey as they fled. Plaintiff Nawaf Sulaiman's daughter fled to Sinjar Mountain and was trapped there until she was able to escape to Kurdistan. ISIS captured one of Plaintiff Nawaf Sulaiman's sisters along with her husband and son (Plaintiffs Baslan Allaw, Ghandi Allaw, Paris Allaw, and Sulaiman Allaw's aunt; uncle; and cousin). ISIS kept this sister in

a cell underground for two years in Syria, killed her husband, and forced her son to become a child soldier until they were able to escape. Another of Plaintiff Nawaf Sulaiman's sisters died from a stroke right after she reached safety. Two of Plaintiff Nawaf Sulaiman's nieces are still missing. Plaintiffs Baslan Allaw, Ghandi Allaw, Paris Allaw, and Sulaiman Allaw's maternal grandmother died upon reaching Sinjar Mountain. ISIS killed Plaintiffs Baslan Allaw, Ghandi Allaw, Paris Allaw, and Sulaiman Allaw's maternal great-uncle and their mother's cousin.

406. ISIS looted and destroyed Plaintiffs Nawaf Sulaiman, Baslan Allaw, Ghandi Allaw, Paris Allaw, and Sulaiman Allaw's real and personal property.

407. As a result of ISIS's invasion, Plaintiffs Nawaf Sulaiman, Baslan Allaw, Ghandi Allaw, Paris Allaw, and Sulaiman Allaw have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Abid Kassim**

408. Plaintiff Abid Kassim is a citizen of the United States and domiciled in the District of Columbia.

409. Plaintiff Abid Kassim has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

410. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Abid Kassim's family, including his parents, brothers, sisters, and their families, fled to Kurdistan. Plaintiff Abid Kassim fearfully followed his family's journey as they fled.

411. ISIS looted and destroyed Plaintiff Abid Kassim's real and personal property.

412. As a result of ISIS's invasion, Plaintiff Abid Kassim has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Khudaidah Havend and Wahida Havend**

413. Plaintiffs Khudaidah Havend and Wahida Havend are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khudaidah Havend and Plaintiff Wahida Havend are married.

414. Khudaidah Havend and Wahida Havend have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

415. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khudaidah Havend's siblings and their families fled to Kurdistan. Plaintiff Khudaidah Havend's brother remained in Sinjar and later fled to Sinjar Mountain, where he was trapped until he was able to escape to Kurdistan. Plaintiff Khudaidah Havend fearfully followed his family's journey as they fled. ISIS killed Plaintiff Khudaidah Havend's uncle. Plaintiff Wahida Havend's family, including her mother, siblings, and their families, fled to Kurdistan. Plaintiff Wahida Havend fearfully followed her family's journey as they fled. Plaintiff Wahida Havend's extended family, including her uncle, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Her uncle had a stroke and died days after fleeing to Kurdistan. Plaintiff Wahida Havend gave birth two days after ISIS's invasion via Cesarean section. She now suffers severe headaches and blood clots following the invasion and still requires medical monitoring.

416. ISIS looted and destroyed Plaintiffs Khudaidah Havend and Wahida Havend's real and personal property.

417. As a result of ISIS's invasion, Plaintiffs Khudaidah Havend and Wahida Havend have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Yousif Nimr**

418. Plaintiff Yousif Nimr is a citizen of the United States and domiciled in the state of Nebraska.

419. Plaintiff Yousif Nimr has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

420. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Yousif Nimr fled to Sinjar Mountain with his parents and siblings, and their families, where they were trapped until they were able to escape to Kurdistan. Plaintiff Yousif Nimr's father died in Kurdistan from a heart attack, and his mother suffers from diabetes since the invasion. ISIS captured Plaintiff Yousif Nimr's aunt and her children, and they are still missing.

421. ISIS looted and destroyed Plaintiff Yousif Nimr's real and personal property.

422. As a result of ISIS's invasion, Plaintiff Yousif Nimr has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Nayyef Abdo**

423. Plaintiff Nayyef Abdo is a citizen of the United States and domiciled in the state of Nebraska.

424. Plaintiff Nayyef Abdo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

425. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nayyef Abdo's family, including his parents, grandmother, siblings, and their families fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Nayyef Abdo's sister-in-law was pregnant during the journey. Plaintiff Nayyef Abdo fearfully followed his family's journey as they fled. While on Sinjar Mountain, Plaintiff Nayyef Abdo's grandmother died. Plaintiff Nayyef Abdo's brother subsequently died. Plaintiff

Nayyef Abdo's great-uncle was killed by ISIS while trying to save Yazidi girls who were attacked by ISIS. Three of Plaintiff Nayyef Abdo's cousins were later killed by IEDs planted by ISIS.

426. ISIS looted and destroyed Plaintiff Nayyef Abdo's real and personal property.

427. As a result of ISIS's invasion, Plaintiff Nayyef Abdo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering, loss of property; and/or loss of his family's society and counsel.

**Sahira Majoo**

428. Plaintiff Sahira Majoo is a citizen of the United States and domiciled in the state of Nebraska.

429. Plaintiff Sahira Majoo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

430. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sahira Majoo's family, including her mother and siblings, fled to Kurdistan. Plaintiff Sahira Majoo and her husband at the time had already travelled to Kurdistan in June of 2014. Plaintiff Sahira Majoo fearfully followed her family's journey as they fled. Plaintiff Sahira Majoo's father and uncles, one of whom had special needs, stayed behind to help her grandmother flee. ISIS captured her father and uncles as they fled to Sinjar Mountain. They are still missing.

431. ISIS looted and destroyed Plaintiff Sahira Majoo's real and personal property.

432. As a result of ISIS's invasion, Plaintiff Sahira Majoo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Ghazalah Hesso, Khalaf Hesso, Khairi Hesso, Mourad Hesso, and Zeri Hesso**

433. Plaintiffs Ghazalah Hesso, Khalaf Hesso, Khairi Hesso, Mourad Hesso, and Zeri Hesso are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Zeri Hesso

and Mourad Hesso are married. Plaintiffs Zeri Hesso and Mourad Hesso are Plaintiffs Ghazalah Hesso, Khalaf Hesso, and Khairi Hesso's parents.

434. Plaintiffs Ghazalah Hesso, Khalaf Hesso, Khairi Hesso, Mourad Hesso, and Zeri Hesso have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

435. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Mourad Hesso and Zeri Hesso's families, including their respective siblings and their families (Plaintiffs Ghazalah Hesso, Khalaf Hesso, and Khairi Hesso's uncles, aunts, and cousins) fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Ghazalah Hesso, Khalaf Hesso, Khairi Hesso, Mourad Hesso, and Zeri Hesso fearfully followed their family's journey as they fled. Due to the invasion, Plaintiff Mourad Hesso suffered hypertension and insomnia due to worrying about his family and community. Plaintiff Mourad Hesso and Ghazalah Hesso suffered from mental trauma for which they had to seek therapy.

436. ISIS looted and destroyed Plaintiffs Ghazalah Hesso, Khalaf Hesso, Khairi Hesso, Mourad Hesso, and Zeri Hesso's real and personal property.

437. As a result of ISIS's invasion, Plaintiffs Ghazalah Hesso, Khalaf Hesso, Khairi Hesso, Mourad Hesso, and Zeri Hesso have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property, and/or loss of their family's society and counsel.

**Dawood Haji**

438. Plaintiff Dawood Haji is a citizen of the United States and domiciled in the state of Nebraska.

439. Plaintiff Dawood Haji has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

440. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Dawood Haji's family, including his mother and siblings, tried to flee to Sinjar Mountain, but they were stopped by ISIS and were told to return home. The next day, his family attempted to flee again and made it to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Dawood Haji fearfully followed his family's journey as they fled. Two of Plaintiff Dawood Haji's close friends have been missing since the invasion.

441. ISIS looted and destroyed Plaintiff Dawood Haji's real and personal property.

442. As a result of ISIS's invasion, Plaintiff Dawood Haji has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Khalida Khalaf**

443. Plaintiff Khalida Khalaf is a citizen of the United States and domiciled in the state of Nebraska.

444. Plaintiff Khalida Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

445. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khalida Khalaf's family, including her aunts, uncles, and grandparents, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Khalida Khalaf fearfully followed her family's journey as they fled. ISIS captured one of Plaintiff Khalida Khalaf's aunts.

446. ISIS looted and destroyed Plaintiff Khalida Khalaf's real and personal property.

447. As a result of ISIS's invasion, Plaintiff Khalida Khalaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Khero Khalaf**

448. Plaintiff Khero Khalaf is a citizen of the United States and domiciled in the state of Nebraska.

449. Plaintiff Khero Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

450. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khero Khalaf's family, including his uncle and cousins, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Khero Khalaf fearfully followed his family's journey as they fled. Plaintiff Khero Khalaf's cousin was killed by ISIS as he fled, and his nephew was injured. ISIS captured Khero Khalaf's cousin and his cousin's wife and children. Plaintiff Khero Khalaf's cousin was killed, and some members of his family are still missing. Plaintiff Khero Khalaf's father struggled with declining health, experiencing two heart attacks before passing away after a third heart attack.

451. ISIS looted and destroyed Plaintiff Khero Khalaf's real and personal property.

452. As a result of ISIS's invasion, Plaintiff Khero Khalaf has experienced economic loss, severe mental anguish, extreme emotional pain and suffering, loss of property, and/or loss of his family's society and counsel.

**Saleh Saffuk and Hakima Antar**

453. Plaintiffs Saleh Saffuk and Hakima Antar are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Saleh Saffuk and Plaintiff Hakima Antar are married.



454. Plaintiffs Saleh Saffuk and Hakima Antar have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

455. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Saleh Saffuk and Hakima Antar's families, including Plaintiff Hakima Antar's parents, siblings, uncles, aunts, and cousins and Plaintiff Saleh Saffuk's uncles and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Saleh Saffuk and Hakima Antar fearfully followed their families' journeys as they fled. ISIS captured eighteen members of Plaintiff Saleh Saffuk's family, and two of his cousins are still missing. Plaintiff Saleh Saffuk now suffers from severe insomnia following the invasion.

456. ISIS looted and destroyed Plaintiffs Saleh Saffuk and Hakima Antar's real and personal property.

457. 101. As a result of ISIS's invasion, Plaintiffs Saleh Saffuk and Hakima Antar have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Darwesh Khalaf**

Plaintiff Darwesh Khalaf is a citizen of the United States and is domiciled in the state of Nebraska.

458. Plaintiff Darwesh Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

459. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Darwesh Khalaf fled to Kurdistan with his wife, mother, children, and their family. Shortly after arriving in Kurdistan, Plaintiff Darwesh Khalaf's mother died of a heart attack.

460. ISIS looted and destroyed Plaintiff Darwesh Khalaf's real and personal property.

461. As a result of ISIS's invasion, Plaintiff Darwesh Khalaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property, and/or loss of his family's society and counsel.

**Barfi Hamo, Kamla Ido, and Hatim Ido**

462. Plaintiffs Barfi Hamo, Kamla Ido, and Hatim Ido are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Kamla Ido and Hatim Ido are Plaintiff Barfi Hamo's children.

463. Plaintiffs Barfi Hamo, Kamla Ido, and Hatim Ido have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

464. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Barfi Hamo and Kamla Ido fled to Kurdistan with Plaintiff Kamla Ido and Hatim Ido's father, grandmother, some siblings, and their families. Plaintiff Hatim Ido fearfully followed his family's journey as they fled. Plaintiffs Kamla Ido and Hatim Ido's grandmother died of a heart attack shortly after arriving in Kurdistan.

465. ISIS looted and destroyed Plaintiffs Barfi Hamo's, Kamla Ido's, and Hatim Ido's real and personal property.

466. As a result of ISIS's invasion, Plaintiffs Barfi Hamo, Kamla Ido, and Hatim Ido have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Hashim Ido**

467. Plaintiff Hashim Ido is a citizen of the United States and domiciled in the state of Nebraska.

468. Plaintiff Hashim Ido has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

469. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hashim Ido fled to Sinjar Mountain with his parents, grandmother, and some of his siblings, where they were trapped until they were able to escape to Kurdistan.

470. ISIS looted and destroyed Plaintiff Hashim Ido's real and personal property.

471. As a result of ISIS's invasion, Plaintiff Hashim Ido has experienced economic loss, severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Salim Ido**

472. Plaintiff Salim Ido is a citizen of the United States and domiciled in the state of Nebraska.

473. Plaintiff Salim Ido has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

474. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Salim Ido fled to Sinjar Mountain with his wife, parents, and some of his siblings, where they were trapped until they were able to escape to Kurdistan. Plaintiff Salim Ido's grandmother died from a heart attack shortly after arriving in Kurdistan.

475. ISIS looted and destroyed Plaintiff Salim Ido's real and personal property.

476. As a result of ISIS's invasion, Plaintiff Salim Ido has experienced economic loss, severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hanaa Abass**

477. Plaintiff Hanaa Abass is a citizen of the United States and domiciled in the state of Nebraska.

478. Plaintiff Hanaa Abass has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

479. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Hanaa Abass's family, including her parents, brothers, and sisters, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hanaa Abass fearfully followed her family's journey as they fled. Plaintiff Hanaa Abass's uncle and his family were trapped in Sinjar for days, surrounded by ISIS terrorists, until they were able to flee to Sinjar Mountain, and then to Kurdistan.

480. ISIS looted and destroyed Plaintiff Hanaa Abass's real and personal property.

481. As a result of ISIS's invasion, Plaintiff Hanaa Abass has experienced economic loss, severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Badal Khalaf, Sawsan Afdi, Ameen Eedo, Siham Merza, Shkur Eedo, and A. B.**

482. Plaintiffs Badal Khalaf, Sawsan Afdi, Ameen Eedo, Siham Merza, Shkur Eedo, and A.B. are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Badal Khalaf and Sawsan Afdi are married and are the parents of Plaintiffs Ameen Eedo and Shkur Eedo. Plaintiff Ameen Eedo and Siham Merza are married. Plaintiff A.B. is the son of Plaintiff Ameen Eedo and Plaintiff Siham Merza.

483. Plaintiffs Badal Khalaf, Sawsan Afdi, Ameen Eedo, Siham Merza, Shkur Eedo, and A.B. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

484. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Badal Khalaf, Sawsan Afdi, Ameen Eedo, Siham Merza, Shkur Eedo, and A.B.

fled to Sinjar Mountain with Plaintiffs Badal Khalaf and Sawsan Afdi's sons (Plaintiff Ameen Eedo's siblings), where they were trapped until they were able to escape to Kurdistan. Plaintiffs Badal Khalaf, Sawsan Afdi, Ameen Eedo, Siham Merza, Shkur Eedo, and A.B. and their family suffered from starvation and poor health during their escape. During the journey, Plaintiff Badal Khalaf injured his foot. To this day, Plaintiff Badal Khalaf still requires regular injections and medications for his foot. ISIS killed Plaintiff Siham Merza's great-uncle. Plaintiffs Ameen Eedo and Siham Merza suffer from persistent nightmares and insomnia triggered by the invasion.

485. ISIS looted and destroyed Plaintiffs Badal Khalaf, Sawsan Afdi, Ameen Eedo, Siham Merza, Shkur Eedo, and A.B.'s real and personal property.

486. As a result of ISIS's invasion, Plaintiffs Badal Khalaf, Sawsan Afdi, Ameen Eedo, Siham Merza, Shkur, and A.B. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Abla Amy**

487. Plaintiff Abla Amy is a citizen of the United States and domiciled in the state of Nebraska.

488. Plaintiff Abla Amy has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

489. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Abla Amy's family, including her mother, father, siblings, and their families, fled to Turkey. Plaintiff Abla Amy fearfully followed her family's journey as they fled. Plaintiff Abla Amy's sister and children, along with Plaintiff Abla Amy's cousins, died while crossing the sea to flee to Europe. Plaintiff Abla Amy's niece is now partially paralyzed.

490. ISIS looted and destroyed Plaintiff Abla Amy's real and personal property.

491. As a result of ISIS's invasion, Plaintiff Abla Amy has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Aishan Hassan and Haji Saido**

492. Plaintiffs Aishan Hassan and Haji Saido are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Aishan Hassan is Plaintiff Haji Saido's mother.

493. Plaintiffs Aishan Hassan and Haji Saido have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

494. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Aishan Hassan and her family, including her husband and children, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Haji Saido fearfully followed his family's journey as they fled. Plaintiff Haji Saido now suffers from conversional disorder and post-traumatic stress disorder following the invasion.

495. ISIS looted and destroyed Plaintiff Aishan Hassan and Haji Saido's real and personal property.

496. As a result of ISIS's invasion, Plaintiff Aishan Hassan and Haji Saido have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khonav Qary**

497. Plaintiff Khonav Qary is a citizen of the United States and domiciled in the state of Nebraska.

498. Plaintiff Khonav Qary has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

499. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khonav Qary's family, including her parents, siblings, and their families, fled to Kurdistan. Plaintiff Khonav Qary fearfully followed her family's journey as they fled. ISIS killed Plaintiff Khonav Qary's brother as a warning to the community. As a result of the trauma she suffered, Plaintiff Khonav Qary suffered mental anguish and had to be treated at a hospital.

500. ISIS looted and destroyed Plaintiff Khonav Qary's real and personal property.

501. As a result of ISIS's invasion, Plaintiff Khonav Qary has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of her family's society and counsel.

**Basima Kurtan and Ahmed Mastto**

502. Plaintiff Basima Kurtan and Ahmed Mastto are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Basima Kurtan and Ahmed Mastto are married.

503. Plaintiffs Basima Kurtan and Ahmed Mastto have suffered severe injuries as a result of ISIS's campaign targeting Yazidis in Iraq.

504. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Basima Kurtan and Ahmed Mastto fled to Kurdistan with their children, Plaintiff Ahmed Mastto's father, and their family. Plaintiff Basima Kurtan's parents, siblings, grandparents, and Plaintiff Ahmed Mastto's sister separately fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. ISIS captured Plaintiff Basima Kurtan's aunt, her husband, and their children. Some of them have returned, while others are still missing. ISIS captured Plaintiff Ahmed Mastto's female cousins and released them a year later. ISIS captured and killed Plaintiff Ahmed Mastto's uncle and cousin.

505. ISIS looted and destroyed Plaintiffs Basima Kurtan and Ahmed Mastto's real and personal property.

506. As a result of ISIS's invasion, Plaintiffs Basima Kurtan and Ahmed Mastto have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of their family's society and counsel.

**Khairi Masto and Ghanim Masto**

507. Plaintiffs Khairi Masto and Ghanim Masto are citizens of the United States and domiciled in the state of Texas. Plaintiffs Khairi Masto and Ghanim Masto are siblings.

508. Plaintiffs Khairi Masto and Ghanim Masto have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

509. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khairi Masto and Ghanim Masto's family, including their parents and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Khairi Masto and Ghanim Masto fearfully followed their family's journey as they fled. ISIS captured Plaintiffs Khairi Masto and Ghanim Masto's sister and her children, as well as his aunt, uncle, and cousin. Plaintiffs Khairi Masto and Ghanim Masto's uncle and cousin are still missing. As a result of the invasion, Plaintiff Ghanim Masto had to interrupt his education and he was not able to complete his college degree.

510. ISIS looted and destroyed Plaintiffs Khairi Masto and Ghanim Masto's real and personal property.

511. As a result of ISIS's invasion, Plaintiffs Khairi Masto and Ghanim Masto have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.



**Sabreen Mahmah**

512. Plaintiff Sabreen Mahmah is a citizen of the United States and domiciled in the state of Texas.

513. Plaintiff Sabreen Mahmah has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

514. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sabreen Mahmah's family, including her parents, brother, and cousins fled briefly to Sinjar Mountain, and then on to Kurdistan. Plaintiff Sabreen Mahmah fearfully followed her family's journey as they fled. Plaintiff Sabreen Mahmah's sister fled to Sinjar Mountain with her newborn baby, her husband, and her husband's family. Plaintiff Sabreen Mahmah's sister's newborn baby died on the mountain. Plaintiff Sabreen Mahmah's pregnant cousin fled to Sinjar Mountain where she gave birth, but her baby did not survive. This experience left Plaintiff Sabreen Mahmah's cousin paralyzed. Plaintiff Sabreen Mahmah's brother was shot in the leg as he was fighting ISIS. ISIS killed two of Plaintiff Sabreen Mahmah's uncles. Plaintiff Sabreen Mahmah suffers from mental health issues following the invasion.

515. 160. As a result of ISIS's invasion, Plaintiff Sabreen Mahmah has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Khalaf Amsikh and Zeidan Kasem**

516. Plaintiffs Khalaf Amsikh and Zeidan Kasem are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khalaf Amsikh is Plaintiff Zeidan Kasem's father.

517. Plaintiffs Khalaf Amsikh and Zeidan Kasem have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

518. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khalaf Amsikh and Zeidan Kasem's family, including Plaintiff Khalaf Amsikh's mother, siblings, daughter, and her family fled to Sinjar Mountain, where they were trapped until they were able to escape to Syria and then Kurdistan. Plaintiffs Khalaf Amsikh and Zeidan Kasem fearfully followed their family's journey as they fled. ISIS captured Plaintiffs Khalaf Amsikh and Zeidan Kasem's cousins, some of whom are still missing. Plaintiff Zeidan Kasem now suffers from anxiety and difficulty sleeping, for which he receives treatment, including medication, following the invasion. Plaintiff Khalaf Amsikh's mother and sister have since died in Kurdistan.

519. ISIS looted and destroyed Plaintiffs Khalaf Amsikh and Zeidan Kasem's real and personal property.

520. 165. As a result of ISIS's invasion, Plaintiffs Khalaf Amsikh and Zeidan Kasem have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Guli Rasho, Maryam Naif, Ameera Naif, and Asad Naif**

521. Plaintiffs Guli Rasho, Maryam Naif, Ameera Naif, and Asad Naif are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Guli Rasho is Plaintiffs Maryam Naif, Ameera Naif, and Asad Naif's mother.

522. Plaintiffs Guli Rasho, Maryam Naif, Ameera Naif, and Asad Naif have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

523. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Guli Rasho, Maryam Naif, Ameera Naif, Asad Naif, and Plaintiff Guli Rasho's other children, fled to Sinjar Mountain, and then to Kurdistan. Plaintiff Guli Rasho's grandmother could not physically flee from ISIS and has not been located following ISIS's invasion. Plaintiff

Ameera Naif, who was nine years old when ISIS invaded her hometown, now suffers from anxiety, depression, post-traumatic stress disorder, and attention-deficit/hyperactivity disorder following the invasion.

524. ISIS looted and destroyed Plaintiffs Guli Rasho, Maryam Naif, Ameera Naif, and Asad Naif's real and personal property.

525. As a result of ISIS's invasion, Plaintiffs Guli Rasho, Maryam Naif, Ameera Naif, and Asad Naif have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khaeri Hadgi and Neam Mahmood**

526. Plaintiffs Khaeri Hadgi and Neam Mahmood are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khaeri Hadgi and Plaintiff Neam Mahmood are married.

527. Plaintiffs Khaeri Hadgi and Neam Mahmood have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

528. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Neam Mahmood's parents and siblings and Plaintiff Khaeri Hadgi's half-siblings, fled to Kurdistan. One of Plaintiff Neam Mahmood's brothers fled to Sinjar Mountain with his family, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Khaeri Hadgi and Neam Mahmood fearfully followed their families' journeys as they fled. Plaintiff Khaeri Hadgi's half-brother later returned to Sinjar Mountain to help others that were trapped.

529. ISIS looted and destroyed Plaintiffs Khaeri Hadgi and Neam Mahmood's real and personal property.

530. As a result of ISIS's invasion, Plaintiffs Khaeri Hadgi and Neam Mahmood have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Waseem Breem**

531. Plaintiff Waseem Breem is a citizen of the United States and domiciled in the state of Nebraska.

532. Plaintiff Waseem Breem has suffered severe injuries as a result of ISIS's campaign targeting Yazidis in Iraq.

533. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Waseem Breem's family, including his grandmother and uncles, fled to Kurdistan. Plaintiff Waseem Breem fearfully followed his family's journey as they fled. Plaintiff Waseem Breem has suffered from insomnia and an inability to concentrate since the invasion.

534. As a result of ISIS's invasion, Plaintiff Waseem Breem has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Shamia Maao**

535. Plaintiff Shamia Maao is a citizen of the United States and domiciled in the state of Texas.

536. Plaintiff Shamia Maao has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

537. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Shamia Maao, fled to Sinjar Mountain with her child and husband's family, where they were trapped until they were able to escape to Kurdistan. Plaintiff Shamia Maao's husband,

who had stayed behind in their village because there wasn't enough room in the car for him, was captured by ISIS. He escaped after ISIS shot his nephew and his cousins. Plaintiff Shamia Maa's family also separately fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Her aunt's family was captured by ISIS, who killed one of her cousins, before the remainder of the family were able to escape.

538. ISIS looted and destroyed Plaintiff Shamia Maa's real and personal property.

539. As a result of ISIS's invasion, Plaintiff Shamia Maa has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Sabri Elias**

540. Plaintiff Sabri Elias is a citizen of the United States and domiciled in the state of Texas.

541. Plaintiff Sabri Elias has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

542. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sabri Elias's family, including his wife, mother, and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Sabri Elias fearfully followed his family's journey as they fled. ISIS captured Plaintiff Sabri Elias's wife and brother, though they were later able to escape. Plaintiff Sabri Elias's brother was injured by ISIS.

543. ISIS looted and destroyed Plaintiff Sabri Elias's real and personal property.

544. As a result of ISIS's invasion, Plaintiff Sabri Elias has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hadi Zagla and Layla Barghash**

545. Plaintiffs Hadi Zagla and Layla Barghash are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Hadi Zagla and Plaintiff Layla Barghash are married.

546. Plaintiffs Hadi Zagla and Layla Barghash have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

547. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Hadi Zagla and Layla Barghash fled to Sinjar Mountain with their families, including their parents and children, where they were trapped until they were able to escape to Kurdistan. Plaintiff Layla Barghash's brother and two of her cousins were killed by ISIS. ISIS captured some of her other cousins, though they were later able to escape.

548. ISIS looted and destroyed Plaintiffs Hadi Zagla and Layla Barghash's real and personal property.

549. As a result of ISIS's invasion, Plaintiffs Hadi Zagla and Layla Barghash have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Armaan Bargish and Nada Bargish**

550. Plaintiffs Armaan Bargish and Nada Bargish are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Armaan Bargish and Plaintiff Nada Bargish are married.

551. Plaintiffs Armaan Bargish and Nada Bargish have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

552. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Armaan Bargish and Nada Bargish fled to Sinjar Mountain with Plaintiff Armaan Bargish's mother, brothers, sisters, and their families, where they were trapped until they were able to escape to Kurdistan. ISIS killed Plaintiff Nada Bargish's brother and two of her cousins, all of whom were also Plaintiff Armaan Bargish's cousins. ISIS captured Plaintiff Nada Bargish's sister and some of her cousins, though they were later able to escape. ISIS also captured Plaintiff Nada Bargish's father and cousins and Plaintiff Armaan Bargish's uncle, but later released them. Plaintiff Nada Bargish's mother and father died from illness following her brother's death.

553. ISIS looted and destroyed Plaintiffs Armaan Bargish and Nada Bargish's real and personal property.

554. As a result of ISIS's invasion, Plaintiffs Armaan Bargish and Nada Bargish have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Haider Elias**

555. Plaintiff Haider Elias is a citizen of the United States and domiciled in the state of Texas.

556. Plaintiff Haider Elias has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

557. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Haider Elias's family, including his mother, brothers, and sisters fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Haider

Elias fearfully followed his family's journey as they fled. Plaintiff Haider Elias's brother and two of his cousins were shot and killed by ISIS. His sisters and cousins were captured by ISIS, though they were later able to escape. Plaintiff Haider Elias's father was also captured by ISIS, until he was able to escape and join his family on Sinjar Mountain. Plaintiff Haider Elias's father and mother died following the invasion.

558. ISIS looted and destroyed Plaintiff Haider Elias's real and personal property.

559. As a result of ISIS's invasion, Plaintiff Haider Elias has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Lozniya Zandinan**

560. Plaintiff Lozniya Zandinan is a citizen of the United States and domiciled in the state of Nebraska.

561. Plaintiff Lozniya Zandinan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

562. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Lozniya Zandinan fled to Sinjar Mountain with her daughter, parents, and other family, where they were trapped until they were able to escape to Kurdistan. Plaintiff Lozniya Zandinan's father returned to Sinjar for other members of the family. ISIS captured Plaintiff Lozniya Zandinan's father and grandfather and took them hostage. ISIS starved and tortured Plaintiff Lozniya Zandinan's father and grandfather in captivity. ISIS killed three of Plaintiff Lozniya Zandinan's cousins. ISIS also shot at Plaintiff Lozniya Zandinan's brother-in-law, and he suffers from limited mobility as a result. In the mountain, Plaintiff Lozniya Zandinan was not able to provide food and milk for her daughter and her newborn nephew. Plaintiff Lozniya Zandinan's



grandfather suffered from the trauma of the capture and died shortly after he was freed. Plaintiff Lozniya Zandinan's father suffers from limited mobility in his hand because of physical injuries he suffered. Plaintiff Lozniya Zandinan's daughter suffers from emotional and mental trauma because of the invasion. Plaintiff Lozniya Zandinan is undergoing psychiatric therapy because of the invasion.

563. ISIS looted and destroyed Lozniya Zandinan's real and personal property.

564. As a result of ISIS's invasion, Plaintiff Plaintiff Lozniya Zandinan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Saad Faraz**

565. Plaintiff Saad Faraz is a citizen of the United States and domiciled in the state of Nebraska.

566. Plaintiff Saad Faraz has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

567. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saad Faraz fled to Kurdistan with his family. Plaintiff Saad Faraz's brother suffered from a head injury while fleeing from ISIS.

568. ISIS looted and destroyed Plaintiff Saad Faraz's real and personal property.

569. As a result of ISIS's invasion, Plaintiff Saad Faraz has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Ali Barkhash and Alva Ido**

570. Plaintiffs Ali Barkhash, and Alya Ido are citizens of the United States and are domiciled in the state of Nebraska. Plaintiffs Ali Barkhash and Alya Ido are married.

571. Plaintiffs Ali Barkhash and Alya Ido have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

572. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Ali Barkhash, Alya Ido, and their child fled to Sinjar Mountain with Plaintiff Ali Barkhash's mother, siblings, and their families, where they were trapped until they were able to escape to Kurdistan. Some of Plaintiff Ali Barkhash's cousins were killed as they fled to Sinjar Mountain, and others were captured by ISIS. Plaintiff Alya Ido's parents and siblings separately fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan.

573. ISIS looted and destroyed Plaintiff Ali Barkhash, and Alya Ido's real and personal property.

574. As a result of ISIS's invasion, Plaintiffs Ali Barkhash and Alya Ido have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ismael Maajo**

575. Plaintiff Ismael Maajo is a citizen of the United States and domiciled in the state of Nebraska.

576. Plaintiff Ismael Maajo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

577. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ismael Maajo's family, including his parents, brothers and sisters, and their families, fled to his uncle's home near Sinjar Mountain. There, ISIS found and attacked them, killing

Plaintiff Ismael Maajo's father, brothers, stepbrother, and nephew. ISIS captured over thirty other members of Plaintiff Ismael Maajo's family. Approximately nine of Plaintiff Ismael Maajo's family members are still missing. Plaintiff Ismael Maajo was in Turkey at the time of ISIS's invasion and fearfully followed his family's journey as they fled to Kurdistan, where he then met them.

578. ISIS looted and destroyed Plaintiff Ismael Maajo's real and personal property.

579. As a result of ISIS's invasion, Plaintiff Ismael Maajo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hassan Hassan and Qaseema Ali**

580. Plaintiffs Hassan Hassan and Qaseema Ali are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Qaseema Ali and Plaintiff Hassan Hassan are married.

581. Plaintiffs Qaseema Ali and Hassan Hassan have suffered severe injuries as a result of ISIS's campaign targeting Yazidis in Iraq.

582. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Qaseema Ali and Hassan Hassan's families, including their parents and siblings, fled to Kurdistan. Plaintiffs Qaseema Ali and Hassan Hassan fearfully followed their families' journeys as they fled. Plaintiff Hassan Hassan's mother suffered a fatal heart attack while living in a camp for internally displaced persons in Kurdistan. Since the invasion, Plaintiff Hassan Hassan suffers from insomnia and chronic depression.

583. ISIS looted and destroyed Plaintiffs Qaseema Ali and Hassan Hassan's real and personal property.

584. As a result of ISIS's invasion, Plaintiffs Qaseema Ali and Hassan Hassan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Jono Ahmed and Khalaf Ahmed**

585. Plaintiffs Jono Ahmed and Khalaf Ahmed are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Jono Ahmed and Khalaf Ahmed are siblings.

586. Plaintiffs Jono Ahmed and Khalaf Ahmed have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

587. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Jono Ahmed and Khalaf Ahmed fled to Kurdistan with their family, including their mother, siblings, uncle, and their families. Plaintiff Khalaf Ahmed now suffers from mental health issues.

588. ISIS looted and destroyed Plaintiffs Jono Ahmed and Khalaf Ahmed's real and personal property.

589. As a result of ISIS's invasion, Plaintiffs Jono Ahmed and Khalaf Ahmed have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khairi Heskan**

590. Plaintiff Khairi Heskan is a citizen of the United States and domiciled in the state of Ohio.

591. Plaintiff Khairi Heskan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

592. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khairi Heskan's wife, who was pregnant at the time, fled to Kurdistan. Plaintiff Khairi Heskan fearfully followed his wife's journey as she fled. Plaintiff Khairi Heskan's wife suffered a miscarriage while walking from Kurdistan to Turkey. Plaintiff Khairi Heskan's cousin and her family did not survive the invasion.

593. ISIS looted and destroyed Plaintiff Khairi Heskan's real and personal property.

594. As a result of ISIS's invasion, Plaintiff Khairi Heskan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Asia Haji**

595. Plaintiff Asia Haji is a citizen of the United States and domiciled in the state of Ohio.

596. Plaintiff Asia Haji has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

597. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Asia Haji, who was pregnant at the time, fled to Kurdistan, and then to Turkey, with her family including her parents and siblings. As they were fleeing to Kurdistan, a bomb went off ahead of Plaintiff Asia Haji's car, and her car was destroyed. Plaintiff Asia Haji and her family were forced to walk the rest of the way to Kurdistan, and as a result Plaintiff Asia Haji suffered a miscarriage and became very ill. Since the invasion, Plaintiff Asia Haji has been receiving treatments for her mental health.

598. ISIS looted and destroyed Plaintiff Asia Haji's real and personal property.

599. As a result of ISIS's invasion, Plaintiff Asia Haji has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Sulaiman Antar**

600. Plaintiff Sulaiman Antar is a citizen of the United States and domiciled in the state of Nebraska.

601. Plaintiff Sulaiman Antar has suffered severe injuries as a result of ISIS's campaign targeting Yazidis in Iraq.

602. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sulaiman Antar's family, including his parents, siblings, uncles, aunts, and cousins fled Sinjar. Plaintiff Sulaiman Antar fearfully followed his family's journey as they fled. Plaintiff Sulaiman Antar's parents, sisters and some of his cousins were trapped in a village north of Sinjar Mountain for a month, and hid from ISIS by moving from home to home. Plaintiff Sulaiman Antar's family members eventually escaped ISIS, though several of his cousins later died in camps for internally displaced persons. Since the invasion, Plaintiff Sulaiman Antar has been experiencing severe depression, for which he is receiving medication and psychological care.

603. ISIS looted and destroyed Plaintiff Sulaman Antar's real and personal property.

604. As a result of ISIS's invasion, Plaintiff Suleiman Antar has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Eeda Hussain and Ibrahim Alkhalaf**

605. Plaintiffs Eeda Hussain and Ibrahim Alkhalaf are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Eeda Hussain and Plaintiff Ibrahim Alkhalaf are married.

606. Plaintiffs Eeda Hussain and Ibrahim Alkhalaf have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

607. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Eeda Hussain's family, including her parents and siblings, and Plaintiff Ibrahim Alkhalaf's family, including his siblings and uncles, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Eeda Hussain and Ibrahim Alkhalaf fearfully followed their families' journeys as they fled. Plaintiff Ibrahim Alkhalaf's sister and her newborn baby almost died on Sinjar Mountain. ISIS detained Plaintiff Eeda Hussain's family in their car when they attempted to flee, but they eventually escaped to Kurdistan. Plaintiff Eeda Hussain now suffers from anxiety attacks following the invasion, for which she has had to be hospitalized.

608. ISIS looted and destroyed Plaintiffs Eeda Hussain and Ibrahim Alkhalaf's real and personal property.

609. As a result of ISIS's invasion, Plaintiffs Eeda Hussain and Ibrahim Alkhalaf have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Saadoon Khudidah**

610. Plaintiff Saadoon Khudidah is a citizen of the United States and domiciled in the state of Indiana.

611. Plaintiff Saadoon Khudidah has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

612. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saadoon Khudidah's parents, brothers, and sisters fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Saadoon Khudidah fearfully followed his family's journey as they fled. Plaintiff Saadoon Khudidah's father suffered a stroke in Kurdistan and has had to take medication following the invasion. Several of Plaintiff Saadoon Khudidah's cousins were killed by ISIS.

613. ISIS looted and destroyed Plaintiff Saadoon Khudidah's real and personal property.

614. As a result of ISIS's invasion, Plaintiff Saadoon Khudidah has experienced economic loss; severe mental anguish, extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Nasima Haskaan**

615. Plaintiff Nasima Haskaan is a citizen of the United States and domiciled in the state of Indiana.

616. Plaintiff Nasima Haskaan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

617. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nasima Haskaan fled to Kurdistan with her siblings and their families. Plaintiff Nasima Haskaan's mother and brothers walked to Syria. Plaintiff Nasima Haskaan's mother now suffers from high blood pressure and diabetes following the invasion and can no longer care for herself.

618. ISIS looted and destroyed Plaintiff Nasima Haskaan's real and personal property.



619. As a result of ISIS's invasion, Plaintiff Nasima Haskaan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Wisam Saado**

620. Plaintiff Wisam Saado is a citizen of the United States and domiciled in the state of Nebraska.

621. Plaintiff Wisam Saado has suffered severe injuries as a result of ISIS's campaign targeting Yazidis in Iraq.

622. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Wisam Saado fled to Kurdistan with his wife, mother, and siblings. ISIS killed several of Plaintiff Wisam Saado's family and friends, and broadcasted the killings on Facebook.

623. ISIS looted and destroyed Plaintiff Wisam Saado's real and personal property.

624. As a result of ISIS's invasion, Plaintiff Wisam Saado has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Ziyad Smoqi, Thaura Smoqi, Awaz Smoqi, and Azad Smoqi**

625. Plaintiffs Ziyad Smoqi, Thaura Smoqi, Awaz Smoqi, and Azad Smoqi are citizens of the United States and domiciled in the state of Ohio. Plaintiff Ziyad Smoqi and Plaintiff Thaura Smoqi are married. Plaintiffs Awaz Smoqi and Azad Smoqi are their children.

626. Plaintiffs Ziyad Smoqi, Thaura Smoqi, Awaz Smoqi, and Azad Smoqi have suffered severe injuries as a result of ISIS's campaign targeting Yazidis in Iraq.

627. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ziyad Smoqi, Thaura Smoqi, Awaz Smoqi, and Azad Smoqi's family, including

Plaintiff Ziyad Smoqi's sister and her children and Plaintiff Thaura Smoqi's mother, siblings, and their families, fled Sinjar. Some went to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan. Others went straight to Kurdistan. Plaintiffs Ziyad Smoqi, Thaura Smoqi, Awaz Smoqi, and Azad Smoqi fearfully followed their families' journey as they fled. ISIS captured Plaintiffs Ziyad Smoqi and Thaura Smoqi's cousin and his family. ISIS released Plaintiffs Ziyad Smoqi and Thaura Smoqi's cousin's family a few years later, but their cousin is still missing. ISIS killed some of Plaintiffs Ziyad Smoqi and Thaura Smoqi's other cousins. Plaintiff Thaura Smoqi experienced a stillbirth following the invasion.

628. ISIS looted and destroyed Plaintiffs Ziyad Smoqi, Thaura Smoqi, Awaz Smoqi, and Azad Smoqi's real and personal property.

629. As a result of ISIS's invasion, Plaintiffs Ziyad Smoqi, Thaura Smoqi, Awaz Smoqi, and Azad Smoqi have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of their family's society and counsel.

**Khalil Sinjari**

630. Plaintiff Khalil Sinjari is a citizen of the United States and domiciled in the state of Michigan.

631. Plaintiff Khalil Sinjari has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

632. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khalil Sinjari's children, parents, brothers, and their families fled to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan. Plaintiff Khalil Sinjari fearfully followed his family's journey as they fled. ISIS captured a number of Plaintiff Khalil

Sinjari's cousins. ISIS killed all the abducted male cousins, and some of the female cousins are still missing.

633. ISIS looted and destroyed Plaintiff Khalil Sinjari's real and personal property.

634. As a result of ISIS's invasion, Plaintiff Khalil Sinjari has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Bayan Haydar**

635. Plaintiff Bayan Haydar is a citizen of the United States and domiciled in the state of Nebraska.

636. Plaintiff Bayan Haydar has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

637. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Bayan Haydar fled to Sinjar Mountain with her parents, siblings, and their families, where they were trapped until they were able to escape to Kurdistan. ISIS captured Plaintiff Bayan Haydar's aunt and her family members. Some of Plaintiff Bayan Haydar's abducted family members returned while, but most are still missing.

638. ISIS looted and destroyed Plaintiff Bayan Haydar's real and personal property.

639. As a result of ISIS's invasion, Plaintiff Bayan Haydar has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of her family's society and counsel.

**Dakhil Odi**

640. Plaintiff Dakhil Odi is a citizen of the United States and domiciled in the state of Texas.

641. Plaintiff Dakhil Odi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

642. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Dakhil Odi's family, including his father and siblings, fled to Sinjar Mountain, where they were trapped until they could escape to Syria. Plaintiff Dakhil Odi's mother and other siblings fled to Kurdistan.

643. ISIS looted and destroyed Plaintiff Dakhil Odi's real and personal property.

644. As a result of ISIS's invasion, Plaintiff Dakhil Odi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hussein Khalaf**

645. Plaintiff Hussein Khalaf is a citizen of the United States and domiciled in the state of Virginia.

646. Plaintiff Hussein Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

647. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hussein Khalaf family, including Plaintiff Hussein Khalaf's sisters, their families, and his cousins, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hussein Khalaf fearfully followed his family's journey as they fled. ISIS captured Plaintiff Hussein Khalaf's cousin and his family, though they were later able to escape. One of Plaintiff Hussein Khalaf's cousins and her daughter were injured by a bomb. Plaintiff Hussein Khalaf now suffers from depression following the invasion.

648. ISIS looted and destroyed Plaintiff Hussein Khalaf's real and personal property.

649. As a result of ISIS's invasion, Plaintiff Hussein Khalaf has experienced economic loss; severe mental anguish, extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Nadin Elias**

650. Plaintiff Nadin Elias is a citizen of the United States and domiciled in the state of Virginia.

651. Plaintiff Nadin Elias has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

652. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nadin Elias's family, including her sisters-in-law, aunts, uncles, and their families, fled to Kurdistan. Plaintiff Nadin Elias fearfully followed her family's journey as they fled. Plaintiff Nadin Elias continues to suffer from severe emotional distress following the invasion.

653. ISIS looted and destroyed Plaintiff Nadin Elias's real and personal property.

654. As a result of ISIS's invasion, Plaintiff Nadin Elias has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Khalid Arab**

655. Plaintiff Khalid Arab is a citizen of the United States and domiciled in the state of Nebraska.

656. Plaintiff Khalid Arab has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

657. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khalid Arab fled to Kurdistan with his mother and newborn daughter. He then joined

his wife and son, who had fled to Turkey when ISIS came. Plaintiff Khalid Arab's son had been unwell, and he died in a hospital in Turkey. Plaintiff Khalid Arab still suffers from nightmares since the invasion.

658. ISIS looted and destroyed Plaintiff Khalid Arab's real and personal property.

659. As a result of ISIS's invasion, Plaintiff Khalid Arab has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Nawroz Sulaiman and Jadaan Khalaf**

660. Plaintiffs Nawroz Sulaiman and Jadaan Khalaf are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Nawroz Sulaiman and Plaintiff Jadaan Khalaf are married.

661. Plaintiffs Nawroz Sulaiman and Jadaan Khalaf have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

662. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Nawroz Sulaiman and Jadaan Khalaf fled to Kurdistan with Plaintiff Jadaan Khalaf's mother, brothers, and their families.

663. ISIS looted and destroyed Plaintiffs Nawroz Sulaiman and Jadaan Khalaf's real and personal property.

664. As a result of ISIS's invasion, Plaintiffs Nawroz Sulaiman and Jadaan Khalaf have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khairi Zandinan**

665. Plaintiff Khairi Zandinan is a citizen of the United States and domiciled in the state of Nebraska.

666. Plaintiff Khairi Zandinan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

667. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khairi Zandinan's family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Khairi Zandinan fearfully followed his family's journey as they fled. Plaintiff Khairi Zandinan's grandfather was left behind and his body was never found. ISIS killed approximately ten members of Plaintiff Khairi Zandinan's extended family. Plaintiff Khairi Zandinan's nephew and brother-in-law were shot by ISIS but managed to escape when ISIS members thought they were dead. ISIS members poured gas over Plaintiff Khairi Zandinan's sister and her children to burn them alive, but then left before setting them alight. ISIS kidnapped Plaintiff Khairi Zandinan's 13-year-old niece, and she is still missing.

668. ISIS looted and destroyed Plaintiff Khairi Zandinan real and personal property.

669. As a result of ISIS's invasion, Plaintiff Khairi Zandinan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Sozan Ajol**

670. Plaintiff Sozan Ajol is a citizen of the United States and domiciled in the state of Nebraska.

671. Plaintiff Sozan Ajol has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

672. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sozan Ajol's mother, siblings, and their families fled Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Sozan Ajol fearfully followed her family's journey as they fled. Plaintiff Sozan Ajol's father could not make the journey and is presumed dead.

673. ISIS looted and destroyed Plaintiff Sozan Ajol's real and personal property.

674. As a result of ISIS's invasion, Plaintiff Sozan Ajol has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Dakheel Zandinan and M. G.**

675. Plaintiffs Dakheel Zandinan and M.G. are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Dakheel Zandinan is the father of Plaintiff M.G.

676. Plaintiffs Dakheel Zandinan and M.G. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

677. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Dakheel Zandinan and M.G. fled to Wardia with Plaintiff Dakhil Zandinan's wife, children, parents, and brothers (Plaintiff M.G.'s mother, siblings, grandparents, and uncles). Plaintiffs Dakheel Zandinan, M.G., and their family were stopped at an ISIS checkpoint into Wardia, where ISIS members stole their jewelry and their car and directed them to continue into Wardia. ISIS gathered the men and children who were twelve and older into a group. Plaintiff Dakheel Zandinan hid with his children and did not go to the group, for fear of ISIS recognizing him as an interpreter for the U.S. Army. After escaping from ISIS, Plaintiffs Dakheel Zandinan, M.G., and their family fled to Sinjar Mountain, where they were trapped until they were able to



escape to Kurdistan. ISIS stopped Plaintiff Dakheel Zandinan's sister, her husband, and her children at a farm outside of Wardia. ISIS shot Plaintiff Dakheel Zandinan's sister's husband as he ran, captured Plaintiff Dakheel Zandinan's sister's daughter, and poured gasoline on Plaintiff Dakheel Zandinan's sister and her other children. Plaintiff Dakheel Zandinan's sister and some of her children managed to escape from ISIS's captivity, but her daughter is still missing. Plaintiff Dakheel Zandinan's grandfather did not flee, and his body has not been found. Plaintiff Dakheel Zandinan's wife now suffers from nightmares following the invasion.

678. ISIS looted and destroyed Plaintiffs Dakheel Zandinan and M.G.'s real and personal property.

679. As a result of ISIS's invasion, Plaintiffs Dakheel Zandinan and M.G. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Babeir Khibil, Hiba Assi, Ameen Khudidah, and Nashwan Khudidah**

680. Plaintiffs Babeir Khibil, Hiba Assi, Ameen Khudidah, and Nashwan Khudidah are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Hiba Assi and Plaintiff Babeir Khibil are married. Plaintiffs Ameen Khudidah and Nashwan Khudidah are their children.

681. Plaintiffs Babeir Khibil, Hiba Assi, Ameen Khudidah, and Nashwan Khudidah have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

682. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Babeir Khibil, Hiba Assi, Ameen Khudidah, and Nashwan Khudidah's family, including Plaintiff Hiba Assi's mother, brother, and sister, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Babeir Khibil, Hiba Assi,

Ameen Khudidah, and Nashwan Khudidah fearfully followed their family's journey as they fled. ISIS killed Plaintiff Babeir Khibil's grandfather and two of his cousins. Plaintiff Babeir Khibil's sister died shortly after reaching Kurdistan. Plaintiff Hiba Assi's grandmother did not reach Sinjar Mountain and is presumed dead.

683. ISIS looted and destroyed Plaintiffs Babeir Khibil, Hiba Assi, Ameen Khudidah, and Nashwan Khudidah's real and personal property.

684. As a result of ISIS's invasion, Plaintiffs Babeir Khibil, Hiba Assi, Ameen Khudidah, and Nashwan Khudidah have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khudedah Murad, Umayah Murad, Miyo Murad, Adil Murad, Khalaf Murad, Hadyah Murad, Saeed Murad, Dawood Murad, Shareef Murad, and Naam Joko**

685. Plaintiffs Khudedah Murad, Umayah Murad, Miyo Murad, Adil Murad, Khalaf Murad, Hadyah Murad, Saeed Murad, Dawood Murad, Shareef Murad, and Naam Joko are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Khudedah Murad, Umayah Murad, Miyo Murad, Adil Murad, Khalaf Murad, Hadyah Murad, Saeed Murad, Dawood Murad, and Shareef Murad are siblings. Plaintiff Naam Joko is their mother.

686. Plaintiffs Khudedah Murad, Umayah Murad, Miyo Murad, Adil Murad, Khalaf Murad, Hadyah Murad, Saeed Murad, Dawood Murad, Shareef Murad, and Naam Joko have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

687. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khudedah Murad, Umayah Murad, Miyo Murad, Hadyah Murad, Saeed Murad, Dawood Murad, Shareef Murad, and Naam Joko fled to Kurdistan with their father (Plaintiff Naam Joko's husband). Plaintiffs Adil Murad and Khalaf Murad fearfully followed their family's journey

as they fled. ISIS captured Khudedah Murad, Umayah Murad, Miyo Murad, Adil Murad, Khalaf Murad, Hadyah Murad, Saeed Murad, Dawood Murad, and Shareef Murad's cousins, one of whom is still missing.

688. ISIS looted and destroyed Plaintiffs Khudedah Murad, Umayah Murad, Miyo Murad, Adil Murad, Khalaf Murad, Hadyah Murad, Saeed Murad, Dawood Murad, Shareef Murad, and Naam Joko's real and personal property.

689. As a result of ISIS's invasion, Plaintiffs Khudedah Murad, Umayah Murad, Miyo Murad, Adil Murad, Khalaf Murad, Hadyah Murad, Saeed Murad, Dawood Murad, Shareef Murad, and Naam Joko have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Omar Haider**

690. Plaintiff Omar Haider is a citizen of the United States and domiciled in the state of Nebraska.

691. Plaintiff Omar Haider has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

692. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Omar Haider's parents and siblings attempted to flee Sinjar. Plaintiff Omar Haider fearfully followed his family's journey as they fled. ISIS captured over 30 members of Plaintiff Omar Haider's family, stole all of their belongings, and separated the men and women. ISIS killed Plaintiff Omar Haider's father and one of his brothers. ISIS kept Plaintiff Omar Haider's mother, brother, and sisters in captivity for over three years in various schools and a prison. During this time, a member of ISIS tried to take one of Plaintiff Omar Haider's sisters to Syria, but the car crashed, killing them both. Plaintiff Omar Haider is still attempting to locate her body. Another of

Plaintiff Omar Haider's sisters tried to kill herself before ISIS could take her, but she was captured and is still missing. While in captivity, Plaintiff Omar Haider's mother and siblings attempted to escape, but were caught and beaten by ISIS. Plaintiff Omar Haider eventually helped them escape. One of his sisters had pretended to be disabled through the duration of her captivity to avoid being trafficked, and was unable to walk once she was freed. ISIS captured and enslaved Plaintiff Omar Haider's thirteen-year-old cousin. One of Plaintiff Omar Haider's other cousins was recently rescued from captivity, as were his aunt and grandmother. ISIS killed three of Plaintiff Omar Haider's uncles and their families. Eight members of Plaintiff Omar Haider's family remain missing, including his brother and two sisters.

693. ISIS looted and destroyed Plaintiff Omar Haider's real and personal property.

694. As a result of ISIS's invasion, Plaintiff Omar Haider has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Ameera Hussein**

695. Plaintiff Ameera Hussein is a citizen of the United States and domiciled in the state of Nebraska.

696. Plaintiff Ameera Hussein has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

697. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ameera Hussein and her family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan.

698. ISIS looted and destroyed Plaintiff Ameera Hussein's real and personal property.

699. As a result of ISIS's invasion, Plaintiff Ameera Hussein has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of her family's society and counsel.

**Majow Kaso, Fahad Qassim, Hadi Qassim, David Majo, and Khedir Qassim**

700. Plaintiffs Majow Kaso, Fahad Qassim, Hadi Qassim, David Majo, and Khedir Qassim are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Majow Kaso is Plaintiffs Fahad Qassim, Hadi Majow Qassim, David Majo, and Khedir Qassim's father.

701. Plaintiffs Majow Kasso, Fahad Qassim, Hadi Majow Qassim, David Majo, and Khedir Qassim have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

702. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Majow Kaso's daughters (Plaintiffs Fahad Qassim, Hadi Majow Qassim, David Majo, and Khedir Qassim's sisters) fled to Kurdistan. Plaintiffs Majow Kaso, Fahad Qassim, Hadi Qassim, David Majo, and Khedir Qassim fearfully followed their family's journey as they fled. Plaintiff Majow Kaso's sister was trapped by ISIS in her home for months until she was able to escape to Kurdistan. Plaintiffs Fahad Qassim, Hadi Majow Qassim, David Majo, and Khedir Qassim's mother later died following the invasion. ISIS captured over thirty of Plaintiffs Fahad Qassim, Hadi Qassim, David Majo, and Khedir Qassim's cousins, beheaded some of their uncles and cousins, and enslaved some of their aunts and cousins.

703. ISIS looted and destroyed Plaintiffs Majow Kasso, Fahad Qassim, Hadi Qassim, David Majo, and Khedir Qassim's real and personal property.

704. As a result of ISIS's invasion, Plaintiffs Majow Kaso, Fahad Qassim, Hadi Qassim, David Majo, and Khedir Qassim have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Almas Alhainto**

705. Plaintiff Almas Alhainto is a citizen of the United States and domiciled in the state of Nebraska.

706. Plaintiff Almas Alhainto has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

707. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Almas Alhainto's siblings fled to Kurdistan. Plaintiff Almas Alhainto fearfully followed her family's journey as they fled. ISIS captured Plaintiff Almas Alhainto's father, who was too unwell to flee with the family, and he later died in ISIS captivity. Plaintiff Almas Alhainto's sisters' cars crashed when fleeing from ISIS, killing and maiming multiple family members. Another of Plaintiff Almas Alhainto's sisters died in a camp for internally displaced persons in Kurdistan. Plaintiff Almas Alhainto's niece was captured by ISIS though she was later able to escape.

708. ISIS looted and destroyed Plaintiff Almas Alhainto's real and personal property.

709. As a result of ISIS's invasion, Plaintiff Almas Alhainto has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Izdihar Sheikh**

710. Plaintiff Izdihar Sheikh is a citizen of the United States and domiciled in the state of Nebraska.

711. Plaintiff Izdihar Sheikh has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

712. In particular, on or about August 3, 2014, during ISIS's invasion of Sinjar, Iraq, Plaintiff Izdihar Sheikh was trapped in Sinjar with her mother and siblings. Plaintiff Izdihar Sheikh and her family hid inside their home for over a week before they were able to escape during which time they feared for their lives.

713. ISIS looted and destroyed Plaintiff Izdihar Sheikh's real and personal property.

714. As a result of ISIS's invasion, Plaintiff Izdihar Sheikh has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Nizar Rasho**

715. Plaintiff Nizar Rasho is a citizen of the United States and domiciled in the state of Nebraska.

716. Plaintiff Nizar Rasho has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

717. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nizar Rasho's family, including his mother, siblings, uncles, and their families, fled to Kurdistan. Plaintiff Nizar Rasho fearfully followed his family's journey as they fled. Plaintiff Nizar Rasho's grandparents were not able to escape and are still missing. Plaintiff Nizar Rasho's cousin-in-law and daughter were kidnapped by ISIS. Plaintiff Nizar Rasho's cousin-in-law died during captivity but her daughter escaped. Plaintiff Nizar Rasho, who was in Kurdistan at the time of the invasion, coordinated with other Yazidi families for their safe escape to Kurdistan.

718. ISIS looted and destroyed Plaintiff Nizar Rasho's real and personal property.

719. As a result of ISIS's invasion, Plaintiff Nizar Rasho experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Khalid Joko, Jad Khurmish, Ayad Khurmish, and Haifaa Khurmish**

720. Plaintiffs Khalid Joko, Jad Khurmish, Ayad Khurmish, and Haifaa Khurmish are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khalid Joko is Plaintiffs Jad Khurmish, Ayad Khurmish, and Haifaa Khurmish's father.

721. Plaintiffs Khalid Joko, Jad Khurmish, Ayad Khurmish, and Haifaa Khurmish have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

722. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khalid Joko, Jad Khurmish, Ayad Khurmish, and Haifaa Khurmish fled to Kurdistan with Jad Khurmish, Ayad Khurmish, and Haifaa Khurmish's mother (Plaintiff Khalid Joko's wife), and siblings (Plaintiff Khalid Joko's children). While fleeing to Kurdistan, Plaintiffs Khalid Joko, Jad Khurmish, Ayad Khurmish, Haifaa Khurmish, and their family were shot at by ISIS. Because of the large number of people that needed to fit in their car, Plaintiff Ayad Khurmish had to walk most of the way to Kurdistan. ISIS captured Plaintiffs Jad Khurmish, Ayad Khurmish, and Haifaa Khurmish's cousins, many of whom were sold into captivity. Following their escape from ISIS captivity, some of their cousins died by suicide. Plaintiff Khalid Joko now suffers from mental health issues following the invasion, for which he has been prescribed medication.

723. ISIS looted and destroyed Plaintiffs Khalid Joko, Jad Khurmish, Ayad Khurmish, and Haifaa Khurmish's real and personal property.



724. As a result of ISIS's invasion, Plaintiffs Khalid Joko, Jad Khurmish, Ayad Khurmish, and Haifaa Khurmish have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Haleema Khalaf and Khudhur Sulaiman**

725. Plaintiffs Haleema Khalaf and Khudhur Sulaiman are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Haleema Khalaf and Khudhur Sulaiman are married.

726. Plaintiffs Haleema Khalaf and Khudhur Sulaiman have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

727. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Haleema Khalaf's family, including her parents, siblings, cousins, and uncles, and Plaintiff Khudhur Sulaiman's siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Haleema Khalaf and Khudhur Sulaiman fearfully followed their family's journey as they fled. ISIS killed two of Plaintiff Haleema Khalaf's cousins: one cousin was killed in front of his sisters, while the other cousin was captured and killed while trying to flee to Sinjar Mountain. ISIS killed Plaintiff Khudhur Sulaiman's cousin and his cousin's son. ISIS captured Plaintiff Haleema Khalaf's uncle, who is still missing.

728. ISIS looted and destroyed Plaintiffs Haleema Khalaf and Khudhur Sulaiman's real and personal property.

729. As a result of ISIS's invasion, Plaintiffs Haleema Khalaf and Khudhur Sulaiman have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Barakat Khalaf and Mayada Malham**

730. Plaintiffs Barakat Khalaf and Mayada Malham are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Barakat Khalaf and Plaintiff Mayada Malham are married.

731. Plaintiffs Barakat Khalaf and Mayada Malham have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

732. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Barakat Khalaf and Mayada Malham fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Mayada Malham was pregnant at the time. ISIS captured several of Plaintiff Mayada Malham's cousins. One of Plaintiff Mayada Malham's close cousins and their children were held by ISIS for about two years. Plaintiff Mayada Malham's uncle and her cousin are still missing.

733. ISIS looted and destroyed Plaintiffs Barakat Khalaf and Mayada Malham's real and personal property.

734. As a result of ISIS's invasion, Plaintiffs Barakat Khalaf and Mayada Malham have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and the loss of their family's society and counsel.

**Saidow Zandinan and Khaton Abas**

735. Plaintiffs Saidow Zandinan and Khaton Abas are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Saidow Zandinan and Khaton Abas are married.

736. Plaintiffs Saidow Zandinan and Khaton Abas have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

737. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khaton Abas fled first to Wardia with Plaintiff Saidow Zandinan's family, where

they were held hostage by ISIS. They managed to escape, and then fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Saidow Zandinan fearfully followed his family's journey as they fled. Plaintiff Saidow Zandinan's father, who was too frail to escape, initially stayed in their village with Plaintiff Saidow Zandinan's uncle. Plaintiff Saidow Zandinan's father eventually left and went to the mountain. Plaintiff Saidow Zandinan's father died due to the strenuous journey upon reaching Kurdistan. Plaintiff Khaton Abas' family, including her grandparents, parents, and siblings also fled to the mountain. On the way, Plaintiff Khaton Abas's grandparents were captured by ISIS. ISIS threw Plaintiff Khaton Abas's grandfather off their truck and he died. Plaintiff Khaton Abas's grandmother is still missing. Plaintiff Khaton Abas's cousin died of thirst while on the mountain. Plaintiff Khaton Abas's father is now suffering from a mental disorder due to the invasion. Plaintiff Khaton Abas's mother and siblings injured their knees and feet while escaping and currently take medication. Plaintiff Khaton Abas seeks medical treatment for depression and anxiety.

738. ISIS looted and destroyed Plaintiffs Saidow Zandinan and Khaton Abas's real and personal property.

739. As a result of ISIS's invasion, Plaintiffs Saidow Zandinan and Khaton Abas have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Samir Eizdin, Hussein Ezdeen, Hazim Ezdeen, Harbi Izdeen, Maha Izdeen, Adib Ayzden, Akram Ezdeen, Joza Shikho, So. H., Sa. H., Sr. H., and Sy. H.**

740. Plaintiffs Samir Eizdin, Hussein Ezdeen, Hazim Ezdeen, Harbi Izdeen, Maha Izdeen, Adib Ayzden, Akram Ezdeen, Ayzden Joza Shikho, So. H., Sa. H., Sr. H., and Sy. H. are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Samir Eizdin, Hussein Ezdeen, Hazim Ezdeen, Harbi Izdeen, Maha Izdeen, Adib Ayzden, Akram Ezdeen are

siblings. Plaintiff Adib Ayzden and Plaintiff Joza Shikho are married. Plaintiff Samir Eizdin is the father of Plaintiffs So. H., and Sa.H.. Plaintiffs Adib Ayzden and Joza Shiko are the parents of Plaintiffs Sr. H. and Sy. H..

741. Plaintiffs Samir Eizdin, Hussein Ezdeen, Hazim Ezdeen, Harbi Izdeen, Maha Izdeen, Adib Ayzden, Akram Ezdeen, Joza Shikho, So. H., Sa. H., Sr. H., and Sy. H. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

742. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Samir Eizdin, Hussein Ezdeen, Hazim Ezdeen, Harbi Izdeen, Maha Izdeen, Adib Ayzden, Akram Ezdeen, Joza Shikho, So. H., Sa. H., Sr. H., and Sy. H. fled to Kurdistan with their families. Plaintiffs Samir Eizdin, Hussein Ezdeen, Hazim Ezdeen, Harbi Izdeen, Maha Izdeen, Adib Ayzden, and Akram Ezdeen's father died in Kurdistan, and their great-uncle died of starvation and dehydration while fleeing. Two of Plaintiffs Samir Eizdin, Hussein Ezdeen, Hazim Ezdeen, Harbi Izdeen, Maha Izdeen, Adib Ayzden and Akram Ezdeen's cousins are still missing.

743. ISIS looted and destroyed Plaintiffs Samir Eizdin, Hussein Ezdeen, Hazim Ezdeen, Harbi Izdeen, Maha Izdeen, Adib Ayzden, Akram Ezdeen, Joza Shikho, So. H., Sa. H., Sr. H., and Sy. H.'s real and personal property.

744. As a result of ISIS's invasion, Plaintiffs Samir Eizdin, Hussein Ezdeen, Hazim Ezdeen, Harbi Izdeen, Maha Izdeen, Adib Ayzden, Akram Ezdeen, Joza Shikho, So. H., Sa. H., Sr. H., and Sy. H., have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Manji Dahhar**

745. Plaintiff Manji Dahhar is a citizen of the United States and domiciled in the state of Nebraska.

746. Plaintiff Manji Dahhar has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

747. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Manji Dahhar fled with her family, including three uncles, to Kurdistan.

748. ISIS looted and destroyed Plaintiff Manji Dahhar's real and personal property.

749. As a result of ISIS's invasion, Plaintiff Manji Dahhar has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Madina Aldakhi**

750. Plaintiff Madina Aldakhi is a citizen of the United States and domiciled in the state of Nebraska.

751. Plaintiff Madina Aldakhi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

752. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Madina Aldakhi fled to Kurdistan with her parents and siblings, at first by car and then, after their car broke down, by foot. Plaintiff Madina Aldakhi's mother now suffers from high blood pressure and diabetes following the invasion, and Plaintiff Madina Aldakhi's father had a heart attack.

753. ISIS looted and destroyed Plaintiff Madina Aldakhi's real and personal property.

754. As a result of ISIS's invasion, Plaintiff Madina Aldakhi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Adool Abdi, Mirza Bakr, and Yousif Beeso**

755. Plaintiffs Adool Abdi, Mirza Bakr, and Yousif Beeso are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Adool Abdi and Plaintiff Mirza Bakr are married. Plaintiff Yousif Beeso is their son.

756. Plaintiffs Adool Abdi, Mirza Bakr, and Yousif Beeso have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

757. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Adool Abdi and Mirza Bakr fled to Kurdistan with their sons, including Plaintiff Yousif Beeso, as well as their daughter and their children's families. ISIS captured Plaintiff Adool Abdi's brother, though he was later able to escape. ISIS captured Plaintiff Mirza Bakr's niece and her family. They killed her niece's husband and held the remainder of the family in captivity for four years.

758. ISIS looted and destroyed Plaintiffs Adool Abdi, Mirza Bakr, and Yousif Beeso's real and personal property.

759. As a result of ISIS's invasion, Plaintiffs Adool Abdi, Mirza Bakr, and Yousif Beeso have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ameen Omar**

760. Plaintiff Ameen Omar is a citizen of the United States and domiciled in the state of Nebraska.

761. Plaintiff Ameen Omar has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

762. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ameen Omar's family, including his mother and siblings, fled to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan. Plaintiff Ameen Omar fearfully followed his family's journey as they fled. Plaintiff Ameen Omar's mother and brother suffered injuries while fleeing to Sinjar Mountain. Plaintiff Ameen Omar's brother suffered from seizures prior to the invasion, but these worsened after he fled from ISIS and he now suffers from a psychological condition.

763. ISIS looted and destroyed Plaintiff Ameen Omar's real and personal property.

764. As a result of ISIS's invasion, Plaintiff Ameen Omar has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Nawaf Dahar**

765. Plaintiff Nawaf Dahar is a citizen of the United States and domiciled in the state of Nebraska.

766. Plaintiff Nawaf Dahar has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

767. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nawaf Dahar's parents, siblings, and cousins, fled to Kurdistan. Plaintiff Nawaf Dahar fearfully followed his family's journey as they fled. Plaintiff Nawaf Dahar's cousins were kidnapped. They are still missing. Plaintiff Nawaf Dahar's cousin who had special needs was left behind in the village and is presumed dead.

768. ISIS looted and destroyed Plaintiff Nawaf Dahar's real and personal property.

769. As a result of ISIS's invasion, Plaintiff Nawaf Dahar has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and the loss of his family's society and counsel.

**Omar Ismail, Aishan Bashar, Oras Osso, Faeza Osso, Shahnaz Osso, and Faisal Osso**

770. Plaintiffs Omar Ismail, Aishan Bashar, Oras Osso, Faeza Osso, Shahnaz Osso, and Faisal Osso are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Omar Ismail and Plaintiff Aishan Bashar are married. Plaintiffs Oras Osso, Faeza Osso, Shahnaz Osso, and Faisal Osso are their children.

771. Plaintiffs Omar Ismail, Aishan Bashar, Oras Osso, Faeza Osso, Shahnaz Osso, and Faisal Osso have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

772. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Omar Ismail's sisters and Plaintiff Aishan Bashar's brothers, sisters, their families, and cousins fled to Sinjar Mountain, where they were trapped until they were able to escape to Syria. Plaintiffs Omar Ismail, Aishan Bashar, Oras Osso, Faeza Osso, Shahnaz Osso, and Faisal Osso fearfully followed their family's journey as they fled. ISIS killed nine of Plaintiff Aishan Bashar's cousins, and her eight-year-old niece (Plaintiffs Oras Osso, Faeza Osso, Shahnaz Osso, and Faisal Osso's cousin) died of dehydration while fleeing. Plaintiffs Oras Osso, Faeza Osso, Shahnaz Osso, and Faisal Osso's uncles later died in the fighting that followed the invasion. Plaintiff Oras Osso now suffers from difficulty sleeping and Plaintiff Faisal Osso now suffers from post-traumatic stress disorder following the invasion.

773. ISIS looted and destroyed Plaintiffs Omar Ismail, Aishan Bashar, Oras Osso, Faeza Osso, Shahnaz Osso, and Faisal Osso's real and personal property.



774. As a result of ISIS's invasion, Plaintiffs Omar Ismail, Aishan Bashar, Oras Osso, Faeza Osso, Shahnaz Osso, and Faisal Osso have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ghazalah Mourad**

775. Plaintiff Ghazalah Mourad is a citizen of the United States and domiciled in the state of Nebraska.

776. Plaintiff Ghazalah Mourad has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

777. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ghazalah Mourad's brothers and their families fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. One of Plaintiff Ghazalah Mourad's nephews died on the way to Kurdistan. Plaintiff Ghazalah Mourad fearfully followed her family's journey as they fled. Plaintiff Ghazalah Mourad has not heard from her sister and her family since ISIS invaded Sinjar.

778. ISIS looted and destroyed Plaintiff Ghazalah Mourad's real and personal property.

779. As a result of ISIS's invasion, Plaintiff Ghazalah Mourad has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of her family's society and counsel.

**Sam Lincoln**

780. Plaintiff Sam Lincoln is a citizen of the United States and domiciled in the state of Nebraska.

781. Plaintiff Sam Lincoln has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

782. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sam Lincoln fled to Sinjar Mountain with his wife, children, parents, stepmother, and siblings, where they were trapped until they were able to escape to Turkey. Plaintiff Sam Lincoln's father died while the family was trapped on Sinjar Mountain.

783. ISIS looted and destroyed Plaintiff Sam Lincoln's real and personal property.

784. As a result of ISIS's invasion, Plaintiff Sam Lincoln has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Diyana Khairo, Dalia Khairo, and Rana Khairo**

785. Plaintiffs Diyana Khairo, Dalia Khairo, and Rana Khairo are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Diyana Khairo, Dalia Khairo, and Rana Khairo are sisters.

786. Plaintiffs Diyana Khairo, Dalia Khairo, and Rana Khairo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

787. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Diyana Khairo, Dalia Khairo, and Rana Khairo fled to Sinjar Mountain with their brother, where they met their parents and other sisters, and where they were trapped until they were able to escape to Turkey. Plaintiffs Diyana Khairo, Dalia Khairo, and Rana Khairo's maternal grandparents did not flee and are presumed dead. ISIS captured Plaintiffs Diyana Khairo, Dalia Khairo, and Rana Khairo's uncle, aunt, and cousins but they escaped.

788. ISIS looted and destroyed Plaintiffs Diyana Khairo, Dalia Khairo, and Rana Khairo's real and personal property.

789. As a result of ISIS's invasion, Plaintiffs Diyana Khairo, Dalia Khairo, and Rana Khairo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Feryal Khairo**

790. Plaintiff Feryal Khairo is a citizen of the United States and domiciled in the state of Nebraska.

791. Plaintiff Feryal Khairo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

792. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Feryal Khairo fled to Sinjar Mountain with her parents and siblings, where they were trapped until they were able to escape to Kurdistan. ISIS captured Plaintiff Feryal Khairo's uncle and his family and held them for a week. ISIS also captured Plaintiff Feryal Khairo's aunt and her family. While ISIS released some of Plaintiff Feryal Khairo's aunt's children, Plaintiff Feryal Khairo's aunt, uncle, and cousin are still missing. Plaintiff Feryal Khairo's grandmother died because of the stress she suffered during ISIS's invasion.

793. ISIS looted and destroyed Plaintiff Feryal Khairo's real and personal property.

794. As a result of ISIS's invasion, Plaintiff Feryal Khairo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Saman Khalil**

795. Plaintiff Saman Khalil is a citizen of the United States and domiciled in the state of Nebraska.

796. Plaintiff Saman Khalil has suffered severe injuries as a result of ISIS's campaign targeting Yazidis in Iraq.

797. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saman Khalil's family, including his parents and sisters, fled to Kurdistan. Plaintiff Saman Khalil fearfully followed his family's journey as they fled. Plaintiff Saman Khalil's elderly father died while fleeing to Kurdistan on an overcrowded and overheated bus.

798. ISIS looted and destroyed Plaintiff Saman Khalil's real and personal property.

799. As a result of ISIS's invasion, Plaintiff Saman Khalil has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Khero Edo, Guli Qasim, Nawaf Khalaf, Ismail Khalaf, and Haifaa Haji**

800. Plaintiffs Khero Edo, Guli Qasim, Nawaf Khalaf, Ismail Khalaf, and Haifaa Haji are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Khero Edo and Guli Qasim are Plaintiffs Nawaf Khalaf and Ismail Khalaf's parents. Plaintiff Ismail Khalaf and Plaintiff Haifaa Haji are married.

801. Plaintiffs Khero Edo, Guli Qasim, Nawaf Khalaf, Ismail Khalaf, and Haifaa Haji have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

802. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khero Edo, Guli Qasim, Ismail Khalaf, and Haifaa Haji fled to Kurdistan with their family, including Plaintiffs Ismail Khalaf and Haifaa Haji's newborn son. Plaintiff Khero Edo's

daughter fled to Sinjar Mountain, where she was trapped until she was able to escape to Kurdistan. Plaintiff Nawaf Khalaf fearfully followed his family's journey as they fled. Plaintiff Haifaa Haji's parents and siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. ISIS captured Plaintiff Khero Edo's uncle, who suffered injuries in captivity. ISIS captured several of Plaintiff Haifaa Haji's parents' cousins and killed her father's cousin. Plaintiff Khero Edo continues to suffer from emotional distress following the invasion. Plaintiff Guli Qasim developed diabetes and impaired vision following the invasion, and she takes prescribed medication to manage her trauma. Plaintiff Nawaf Khalaf now suffers from nightmares and Plaintiff Haifaa Haji now suffers from psychological effects, including difficulty sleeping, following the invasion.

803. ISIS looted and destroyed Plaintiffs Khero Edo, Guli Qasim, Nawaf Khalaf, Ismail Khalaf, and Haifaa Haji's real and personal property.

804. As a result of ISIS's invasion, Plaintiffs Khero Edo, Guli Qasim, Nawaf Khalaf, Ismail Khalaf, and Haifaa Haji have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Hanaa Khalaf and Shahab Bashar**

805. Plaintiffs Hanaa Khalaf and Shahab Bashar are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Hanaa Khalaf and Plaintiff Shahab Bashar are married.

806. Plaintiffs Hanaa Khalaf and Shahab Bashar have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

807. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Hanaa Khalaf and Shahab Bashar fled to Sinjar Mountain with their one-month-old

daughter, where they were trapped until they were able to escape to Kurdistan. ISIS killed Plaintiff Hanaa Khalaf's cousin, and another cousin is still missing.

808. ISIS looted and destroyed Plaintiffs Hanaa Khalaf and Shahab Bashar's real and personal property.

809. As a result of ISIS's invasion, Plaintiffs Hanaa Khalaf and Shahab Bashar have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khokhi Khudeeda, Ibrahim Zandinan, Maher Zandinan, Dalva Zndinan, and Khalida Zndinan**

810. Plaintiffs Khokhi Khudeeda, Ibrahim Zandinan, Maher Zandinan, Dalva Zndinan, and Khalida Zndinan are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khokhi Khudeeda is Plaintiffs Ibrahim Zandinan, Maher Zandinan, Dalva Zndinan, and Khalida Zndinan's mother.

811. Plaintiffs Khokhi Khudeeda, Ibrahim Zandinan, Maher Zandinan, Dalva Zndinan, and Khalida Zndinan have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

812. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khokhi Khudeeda, Ibrahim Zandinan, Maher Zandinan, Dalva Zndinan, and Khalida Zndinan fled to Wardia with Plaintiff Khokhi Khudeeda's husband and other children. ISIS gathered Plaintiff Ibrahim Zandinan and his father, uncles, and grandfather and ordered them to convert to Islam, threatening them with weapons. After three days, ISIS departed Wardia to fight elsewhere and Plaintiffs Khokhi Khudeeda, Ibrahim Zandinan, Maher Zandinan, Dalva Zndinan, and Khalida Zndinan were able to escape and flee to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Ibrahim Zandinan, Maher Zandinan,

Dalya Zndinan, and Khalida Zndinan's great-grandfather was unable to flee with the family and was killed by ISIS. ISIS captured Plaintiff Khokhi Khudeeda's brother (Plaintiffs Ibrahim Zandinan, Maher Zandinan, Dalya Zndinan, and Khalida Zndinan's uncle), his son, and her cousins, and ISIS killed seven of Plaintiff Khokhi Khudeeda's cousins. ISIS captured Plaintiff Khokhi Khudeeda's niece, who is still missing, and shot Plaintiff Khokhi Khudeeda's brother in the hand as he ran from ISIS.

813. ISIS looted and destroyed Plaintiffs Khokhi Khudeeda, Ibrahim Khaleel Ghanim Zandinan, Maher Zandinan, Dalya Zndinan, and Khalida Zndinan's real and personal property.

814. As a result of ISIS's invasion, Plaintiffs Khokhi Khudeeda, Ibrahim Zandinan, Maher Zandinan, Dalya Zndinan, and Khalida Zndinan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Layla Karee**

815. Plaintiff Layla Karee is a citizen of the United States and domiciled in the state of Nebraska.

816. Plaintiff Layla Karee has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

817. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Layla Karee's family, including her parents and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Layla Karee fearfully followed her family's journey as they fled.

818. ISIS looted and destroyed Plaintiff Layla Karee's real and personal property.

819. As a result of ISIS's invasion, Plaintiff Layla Karee has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Hassan Hassan**

820. Plaintiff Hassan Hassan is a citizen of the United States and domiciled in the state of Nebraska.

821. Plaintiff Hassan Hassan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

822. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hassan Hassan fled to Sinjar Mountain with his wife, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hassan Hassan's wife now suffers from depression following the invasion.

823. ISIS looted and destroyed Plaintiff Hassan Hassan's real and personal property.

824. As a result of ISIS's invasion, Plaintiff Hassan Hassan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Basam Aldakhi**

825. Plaintiff Basam Aldakhi is a citizen of the United States and domiciled in the state of Nebraska.

826. Plaintiff Basam Aldakhi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

827. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Basam Aldakhi fled to Kurdistan with his mother, siblings, and their families.



Another of Plaintiff Basam Aldakhi's sisters fled separately to Sinjar Mountain, where she was trapped until she was able to escape. ISIS's invasion interrupted Plaintiff Basam Aldakhi's studies in law school.

828. ISIS looted and destroyed Plaintiff Basam Aldakhi's real and personal property.

829. As a result of ISIS's invasion, Plaintiff Basam Aldakhi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Adnan Shamo**

830. Plaintiff Adnan Shamo is a citizen of the United States and domiciled in the state of Nebraska.

831. Plaintiff Adnan Shamo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

832. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Adnan Shamo's family, including his wife, mother, and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Adnan Shamo fearfully followed his family's journey as they fled. Plaintiff Adnan Shamo's siblings and nephew still suffer from physical injuries sustained during their journey to Kurdistan. Plaintiff Adnan Shamo's aunt and uncle passed away a few months after reaching Kurdistan from the strain of the journey. Plaintiff Adnan Shamo's wife witnessed her aunt pass away on Sinjar Mountain and saw multiple children get shot by ISIS on the way to the mountain and multiple children die of dehydration while on the mountain. As a result, Plaintiff Adnan Shamo's wife suffers from severe post-traumatic stress disorder, including depression and nightmares. Plaintiff Adnan Shamo

relocated to Kurdistan for two years to care for his wife until she attained her permanent resident status in the United States.

833. ISIS looted and destroyed Plaintiff Adnan Shamo's real and personal property.

834. As a result of ISIS's invasion, Plaintiff Adnan Shamo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Adla Hasan, Mahmood Ayoob, Muhand Kheder, Mo. K., M. K., and Ma. K.**

835. Plaintiffs Adla Hasan, Mahmood Ayoob, Muhand Kheder, Mo. K., M.K., and Ma. K., are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Adla Hasan and Plaintiff Mahmood Ayoob are married. Plaintiffs Muhand Kheder, Mo. K., M.K., and Ma. K. are their children.

836. Plaintiffs Adla Hasan, Mahmood Ayoob, Muhand Kheder, Mo. K., M.K., Ma. K., and Md. K. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

837. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Adla Hasan, Mahmood Ayoob, Muhand Kheder, Mo. K., M. K., and Ma. K. fled to Kurdistan with their extended family. Plaintiffs Adla Hasan and Mahmood Ayoob's car broke down on the way to Kurdistan, and as they were switching cars, ISIS shot at Plaintiffs Adla Hasan and Mahmood Ayoob. ISIS captured Plaintiff Adla Hasan's aunt, uncle, and cousins. Plaintiff Adla Hasan's aunt and most of her cousins have since escaped, but Plaintiff Adla Hasan's uncle and one cousin are still missing. ISIS captured Plaintiff Mahmood Ayoob's father, but he escaped a few days later.

838. ISIS looted and destroyed Plaintiffs Adla Hasan, Mahmood Ayoob, Muhand Kheder, Mo. K., M. K., and Ma. K.'s real and personal property.

839. As a result of ISIS's invasion, Plaintiffs Adla Hasan, Mahmood Ayoob, Muhand Kheder, Mo. K., M. K., and Ma. K. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of their family's society and counsel.

**Khadeeda Sharo and Kamal Ali**

840. Plaintiffs Khadeeda Sharo and Kamal Ali are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khadeeda Sharo is Plaintiff Kamal Ali's father.

841. Plaintiffs Khadeeda Sharo and Kamal Ali have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

842. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khadeeda Sharo and Kamal Ali fled to Kurdistan with Plaintiff Khadeeda Sharo's wife and other sons. ISIS captured Plaintiff Khadeeda Sharo's wife's parents and siblings and their families, but they were able to escape and later fled to Kurdistan.

843. ISIS looted and destroyed Plaintiffs Khadeeda Sharo and Kamal Ali's real and personal property.

844. As a result of ISIS's invasion, Plaintiffs Khadeeda Sharo and Kamal Ali have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hayder Murad and Fadwa Yousif**

845. Plaintiffs Hayder Murad and Fadwa Yousif are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Hayder Murad is Plaintiff Fadwa Yousif's father.

846. Plaintiffs Hayder Murad and Fadwa Yousif have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

847. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, members of Plaintiffs Hayder Murad and Fadwa Yousif's family, including Plaintiff Hayder Murad's parents, siblings (Plaintiff Fadwa Yousif's grandparents, aunts, and uncles), and their families fled to Kurdistan. Other members of their family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Hayder Murad and Fadwa Yousif fearfully followed their family's journey as they fled. ISIS captured Plaintiff Fadwa Yousif's uncle and aunt and their twelve children, who spent several weeks in captivity until they were able to escape. During the escape, ISIS shot Plaintiff Fadwa Yousif's aunt, uncle, and cousins. ISIS also surrounded Plaintiff Fadwa Yousif's grandfather and other uncle's village and held them under siege until they were able to escape. ISIS shot Plaintiff Hayder Murad's nephew (Plaintiff Fadwa Yousif's cousin) as he fled. Plaintiff Hayder Murad's mother was injured travelling from Kurdistan to Turkey, and later died. Plaintiff Hayder Murad's father died of a heart attack following the invasion. ISIS captured Plaintiff Hayder Murad's sister and her family, though they were later able to escape. Plaintiff Hayder Murad's uncle died of cancer in Kurdistan after the invasion.

848. ISIS looted and destroyed Plaintiffs Hayder Murad and Fadwa Yousif's real and personal property.

849. As a result of ISIS's invasion, Plaintiffs Hayder Murad and Fadwa Yousif have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Hend Atallah and Ghassan Kheder**

850. Plaintiffs Hend Atallah and Ghassan Kheder are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Hend Atallah and Ghassan Kheder are married.

851. Plaintiffs Hend Atallah and Ghassan Kheder have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

852. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hend Atallah's family, including her parents, siblings, and grandparents, and Plaintiff Ghassan Kheder's family, including his parents, siblings, and uncles, fled to Sinjar Mountain, where they were trapped until they were able to escape Kurdistan. Plaintiffs Hend Atallah and Ghassan Kheder fearfully followed their families' journeys as they fled. ISIS captured and tortured Plaintiff Hend Atallah's grandmother. She died the night she was released, upon arrival to a camp for internally displaced persons in Kurdistan. Plaintiff Hend Atallah's other grandmother died after returning to Sinjar and seeing the destruction.

853. ISIS looted and destroyed Plaintiffs Hend Atallah and Ghassan Kheder's real and personal property.

854. As a result of ISIS's invasion, Plaintiffs Hend Atallah and Ghassan Kheder have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of their family's society and counsel.

**Hussein Rasho, Wadhhah Dawood, and Kawkab Rasho**

855. Plaintiffs Hussein Rasho, Wadhhah Dawood, and Kawkab Rasho are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Hussein Rasho and Plaintiff Wadhhah Dawood are married, and Plaintiff Kawkab Rasho is their son.

856. Plaintiffs Hussein Rasho, Wadhhah Dawood, and Kawkab Rasho have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

857. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Hussein Rasho, Wadhhah Dawood, and Kawkab Rasho fled to Kurdistan. ISIS killed Plaintiff Kawkab Rasho's cousin, and captured two of his cousins' families. They are still missing.

858. ISIS looted and destroyed Plaintiffs Hussein Rasho, Wadhhah Dawood, and Kawkab Rasho's real and personal property.

859. As a result of ISIS's invasion, Plaintiffs Hussein Rasho, Wadhhah Dawood, and Kawkab Rasho have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Gulistan Haji**

860. Plaintiff Gulistan Haji is a citizen of the United States and domiciled in the state of Nebraska.

861. Plaintiff Gulistan Haji has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

862. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Gulistan Haji fled to Kurdistan with her parents and siblings. Plaintiff Gulistan Haji's grandparents separately fled to Sinjar Mountain with their children, where they were trapped until they were able to escape to Kurdistan. Plaintiff Gulistan Haji's cousin was trapped in Mosul when ISIS invaded and is presumed dead.

863. ISIS looted and destroyed Plaintiff Gulistan Haji's real and personal property.

864. As a result of ISIS's invasion, Plaintiff Gulistan Haji has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Barakat Rasho**

865. Plaintiff Barakat Rasho is a citizen of the United States and domiciled in the state of Nebraska.

866. Plaintiff Barakat Rasho has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

867. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Barakat Rasho's family fled Sinjar. Plaintiff Barakat Rasho fearfully followed his family's journey as they fled. ISIS killed Plaintiff Barakat Rasho's cousin. ISIS captured Plaintiff Barakat Rasho's father-in-law, but he was able to escape. Plaintiff Barakat Rasho now suffers from the psychological effects of the invasion, including flashbacks.

868. 503. ISIS looted and destroyed Plaintiff Barakat Rasho's real and personal property.

869. 504. As a result of ISIS's invasion, Plaintiff Barakat Hussein Rasho has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Khawlah Maleko and Khudidah Maleko**

870. Plaintiffs Khawlah Maleko and Khudidah Maleko are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khawlah Maleko and Plaintiff Khudidah Maleko are married.

871. Plaintiffs Khawlah Maleko and Khudidah Maleko have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

872. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khawlah Maleko's parents and siblings and Plaintiff Khudidah Maleko's mother and siblings fled to Kurdistan. Plaintiffs Khawlah Maleko and Khudidah Maleko fearfully followed their families' journeys as they fled. ISIS captured Plaintiff Khudidah Maleko's father twice, but each time he was let go. Plaintiff Khudidah Maleko's father later died after two years in the camps for internally displaced persons. ISIS captured Plaintiff Khudidah Maleko's father's cousin's family and killed one of the sons. The others are still missing.

873. ISIS looted and destroyed Plaintiffs Khawlah Maleko and Khudidah Maleko's real and personal property.

874. As a result of ISIS's invasion, Plaintiffs Khawlah Maleko and Khudidah Maleko have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Koulan Mourad and Nancy Khalil**

875. Plaintiffs Koulan Mourad and Nancy Khalil are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Koulan Mourad is Plaintiff Nancy Khalil's mother.

876. Plaintiffs Koulan Mourad and Nancy Khalil have suffered severe injuries as a result of ISIS's campaign targeting Yazidis in Iraq.

877. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Koulan Mourad and Nancy Khalil's family, including Plaintiff Koulan Mourad's son, daughter, grandchildren, and siblings fled to Kurdistan. Plaintiffs Koulan Mourad and Nancy Khalil fearfully followed their family's journey as they fled. Plaintiff Koulan Mourad's son



committed suicide shortly after the invasion. Plaintiff Koulan Mourad's four-year-old granddaughter was staying with her son-in-law's family in Sinjar at the time of the invasion. She is still missing and is presumed dead. Plaintiff Koulan Mourad's niece fled to Sinjar Mountain with her newborn baby during the invasion but was unable to make it up the mountain and is presumed dead. Plaintiff Koulan Mourad's nephew was staying in a home in Sinjar that exploded during the invasion and is presumed dead. ISIS killed two of Plaintiff Koulan Mourad's other nephews and sent photos of their bodies to their families. Another of Plaintiff Koulan Mourad's nephews went missing while attempting to fight ISIS and is presumed dead. One of Plaintiff Koulan Mourad's nephews was in Germany at the time of the invasion and was informed in error that ISIS had killed his entire family. He committed suicide after hearing the news. ISIS killed over ten of Plaintiff Koulan Mourad's cousins. Plaintiff Koulan Mourad now suffers from the psychological effects of the invasion, for which she is receiving medication.

878. ISIS looted and destroyed Plaintiffs Koulan Mourad and Nancy Khalil's real and personal property.

879. As a result of ISIS's invasion, Plaintiffs Koulan Mourad and Nancy Khalil have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khoudeida Saadoon**

880. Plaintiff Khoudeida Saadoon is a citizen of the United States and domiciled in the state of Nebraska.

881. Plaintiff Khoudeida Saadoon has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

882. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khoudeida Saadoon's family, including his nephews and cousins, fled to Kurdistan. Plaintiff Khoudeida Saadoon fearfully followed his family's journey as they fled. Plaintiff Khoudeida Saadoon's sister died as she was too unwell to flee her home when ISIS invaded. Plaintiff Khoudeida Saadoon now suffers from extreme mental anguish following the invasion that often requires hospitalization.

883. ISIS looted and destroyed Plaintiff Khoudeida Saadoon's real and personal property.

884. As a result of ISIS's invasion, Plaintiff Khoudeida Saadoon has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hasan Khalil**

885. Plaintiff Hasan Khalil is a citizen of the United States and domiciled in the state of Nebraska.

886. Plaintiff Hasan Khalil has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

887. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hasan Khalil's sister and her family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. One of Plaintiff Hasan Khalil's nieces went missing as they were fleeing to the mountain, and her whereabouts are still unknown. Plaintiff Hasan Khalil fearfully followed his family's journey as they fled. ISIS captured three of Plaintiff Hasan Khalil's cousins and they are still missing. ISIS beheaded Plaintiff Hasan Khalil's uncle.

Plaintiff Hasan Khalil's other uncle, who suffered from a mental illness, was left behind in the village, and ISIS killed him.

888. ISIS looted and destroyed Plaintiff Hasan Khalil's real and personal property.

889. As a result of ISIS's invasion, Plaintiff Hasan Khalil has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Sharifa Khalil**

890. Plaintiff Sharifa Khalil is a citizen of the United States and domiciled in the state of Arizona.

891. Plaintiff Sharifa Khalil has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

892. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sharifa Khalil's family, including her grandmother and cousin, fled to Sinjar Mountain, where they were trapped until they were able to escape to Turkey. Plaintiff Sharifa Khalil's aunt and other cousins fled directly to Kurdistan. Plaintiff Sharifa Khalil fearfully followed her family's journey as they fled. One of Plaintiff Sharifa Khalil's cousins, who had given birth shortly before ISIS's invasion, died in Turkey. After living in the camps for internally displaced persons in Kurdistan, some of Plaintiff Sharifa Khalil's family returned to their hometown. There, both her grandmother and aunt were killed when a bomb left in their house exploded. Shortly after, Plaintiff Sharifa Khalil's brother committed suicide.

893. ISIS looted and destroyed Plaintiff Sharifa Khalil's real and personal property.

894. As a result of ISIS's invasion, Plaintiff Sharifa Khalil has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Murad Mousa, Kori Ahmed, Hussein Maroo, Isam Maroo, Sultan Maroo, Faeza Maroo, Madleen Maroo, Alya Maroo, and Hazim Maroo**

895. Plaintiffs Murad Mousa, Kori Ahmed, Hussein Maroo, Isam Maroo, Sultan Maroo, Faeza Maroo, Madleen Maroo, Alya Maroo, and Hazim Maroo are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Murad Mousa and Plaintiff Kori Ahmed are married. Plaintiffs Hussein Maroo, Isam Maroo, Sultan Maroo, Faeza Maroo, Madleen Maroo, Alya Maroo, and Hazim Maroo are their children.

896. Plaintiffs Murad Mousa, Kori Ahmed, Hussein Maroo, Isam Maroo, Sultan Maroo, Faeza Maroo, Madleen Maroo, Alya Maroo, and Hazim Maroo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

897. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Murad Mousa, Kori Ahmed, Hussein Maroo, Isam Maroo, Faeza Maroo, Madleen Maroo, Alya Maroo, and Hazim Maroo fled to Kurdistan with another of Plaintiffs Murad Mousa and Kori Ahmed's children. Plaintiffs Murad Mousa and Kori Ahmed's siblings also fled Sinjar separately. ISIS captured several of Plaintiffs Murad Mousa and Kori Ahmed's relatives. Plaintiff Kori Ahmed's brother and Plaintiff Murad Mousa's brother both experienced severe emotional trauma during and after the invasion, and each died a few months after the invasion. Plaintiffs Kori Ahmed, Murad Mousa, and Isam Maroo now suffer from psychological effects following the invasion and are currently receiving treatment, including medication. Plaintiff Hussein Maroo developed diabetes following the invasion.

898. ISIS looted and destroyed Plaintiffs Murad Mousa, Kori Ahmed, Hussein Maroo, Isam Maroo, Sultan Maroo, Faeza Maroo, Madleen Maroo, Alya Maroo, and Hazim Maroo's real and personal property.

899. As a result of ISIS's invasion, Plaintiffs Murad Mousa, Kori Ahmed, Hussein Maroo, Isam Maroo, Sultan Maroo, Faeza Maroo, Madleen Maroo, Alya Maroo, and Hazim Maroo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Hasan Fandi**

900. Plaintiff Hasan Fandi is a citizen of the United States and domiciled in the state of Michigan.

901. Plaintiff Hasan Fandi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

902. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hasan Fandi fled to Kurdistan with his family. Plaintiff Hasan Fandi lived in the United States but was visiting family in Sinjar with his mother and was planning to return to the United States the day ISIS invaded. ISIS stopped Plaintiff Hasan Fandi and his mother at several checkpoints while they fled to the airport.

903. ISIS looted and destroyed Plaintiff Hasan Fandi's real and personal property.

904. As a result of ISIS's invasion, Plaintiff Hasan Fandi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Sarkawt Badeel and Salar Badeel**

905. Plaintiffs Sarkawt Badeel and Salar Badeel are citizens of the United States and domiciled in the state of Texas. Plaintiffs Sarkawt Badeel and Salar Badeel are brothers.

906. Plaintiffs Sarkawt Badeel and Salar Badeel have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

907. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Sarkawt Badeel and Salar Badeel fled to Kurdistan with their parents, sisters, and cousins.

908. ISIS looted and destroyed Plaintiffs Sarkawt Badeel and Salar Badeel's real and personal property.

909. As a result of ISIS's invasion, Plaintiffs Sarkawt Badeel and Salar Badeel have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Anwar Elias**

910. Plaintiff Anwar Elias is a citizen of the United States and domiciled in the state of Texas.

911. Plaintiff Anwar Elias has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

912. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Anwar Elias fled to Sinjar Mountain with her parents and siblings, where they were trapped until they were able to escape.

913. ISIS looted and destroyed Plaintiff Anwar Elias's real and personal property.

914. As a result of ISIS's invasion, Plaintiff Anwar Elias has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Hamy Hamdan**

915. Plaintiff Hamy Hamdan is a citizen of the United States and domiciled in the state of Nebraska.

916. Plaintiff Hamy Hamdan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

917. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hamy Hamdan's family, including his siblings, uncles, and cousins, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hamy Hamdan fearfully followed his family's journey as they fled. ISIS beheaded Plaintiff Hamy Hamdan's cousin. Plaintiff Hamy Hamdan now suffers from poor physical health following the invasion and has undergone many surgeries.

918. ISIS looted and destroyed Plaintiff Hamy Hamdan's real and personal property.

919. As a result of ISIS's invasion, Plaintiff Hamy Hamdan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Eedo Khalaf and Sevi Mourad**

920. Plaintiffs Eedo Khalaf and Sevi Mourad are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Eedo Khalaf and Plaintiff Sevi Mourad are married.

921. Plaintiffs Eedo Khalaf and Sevi Mourad have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

922. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Eedo Khalaf's family and Sevi Mourad's aunts, uncles, and cousins fled to Kurdistan. Plaintiffs Eedo Khalaf and Sevi Mourad fearfully followed their families' journeys as they fled. Plaintiff Eedo Khalaf's uncle's car broke down on the way to Kurdistan, and his family, including his cousins, are still missing and presumed dead. ISIS beheaded Plaintiff Sevi Mourad's father's cousin.

923. ISIS looted and destroyed Plaintiffs Eedo Khalaf and Sevi Mourad's real and personal property.

924. As a result of ISIS's invasion, Plaintiffs Eedo Khalaf and Sevi Mourad have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Layla Mourad**

925. Plaintiff Layla Mourad is a citizen of the United States and domiciled in the state of Nebraska.

926. Plaintiff Layla Mourad has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

927. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Layla Mourad's parents, siblings, cousins, and their families fled to Kurdistan, then to Turkey. Plaintiff Layla Mourad fearfully followed her family's journey as they fled. Most of Plaintiff Layla Mourad's family then sought asylum in Germany, and her father died shortly after arriving in Germany. ISIS captured Plaintiff Layla Mourad's cousin, who is still missing.

928. ISIS looted and destroyed Plaintiff Layla Mourad's real and personal property.



929. As a result of ISIS's invasion, Plaintiff Layla Mourad has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Ibrahim Mourad**

930. Plaintiff Ibrahim Mourad is a citizen of the United States and domiciled in the state of Nebraska.

931. Plaintiff Ibrahim Mourad has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

932. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ibrahim Mourad's family, including his uncles, aunts, and cousins fled. Some of his family members fled to directly to Kurdistan while others fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. One of Plaintiff Ibrahim Mourad's cousins, who was mentally disabled, disappeared when ISIS invaded and remains missing.

933. ISIS looted and destroyed Plaintiff Ibrahim Mourad's real and personal property.

934. As a result of ISIS's invasion, Plaintiff Ibrahim Mourad has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Khansa Hasan, Haifaa Osman, and Hadia Smoqi**

935. Plaintiffs Khansa Hasan, Haifaa Osman, and Hadia Smoqi are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khansa Hasan is Plaintiff Haifaa Osman's mother and Plaintiff Hadia Smoqi's mother-in-law.

936. Plaintiffs Khansa Hasan, Haifaa Osman, and Hadia Smoqi have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

937. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hadia Smoqi fled to Kurdistan and then continued by foot to Turkey with her parents and siblings. Plaintiff Hadia Smoqi's father died shortly after reaching Turkey. Plaintiffs Khansa Hasan and Haifaa Osman's family, including Plaintiff Khansa Hasan's mother and siblings, fled to Kurdistan. Plaintiffs Khansa Hasan and Haifaa Osman fearfully followed their family's journey as they fled.

938. ISIS looted and destroyed Plaintiffs Khansa Hasan, Haifa Osman, and Hadia Smoqi's real and personal property.

939. As a result of ISIS's invasion, Plaintiffs Khansa Hasan, Haifaa Osman, and Hadia Smoqi have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Yousif Zandinan**

940. Plaintiff Yousif Zandinan is a citizen of the United States and domiciled in the state of Nebraska.

941. Plaintiff Yousif Zandinan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

942. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Yousif Zandinan's family, including his wife, children, parents, and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Yousif Zandinan fearfully followed his family's journey as they fled. Plaintiff Yousif Zandinan was already in Kurdistan at the time of the invasion, and met his family at the Syrian border once they descended from Sinjar Mountain. While on the mountain, Plaintiff Yousif Zandinan's wife could not produce enough milk to feed their nine-month-old daughter, and had to take milk from

goats and sheep on the mountain. This caused Plaintiff Yousif Zandinan's daughter to become ill, and she spent ten days in the emergency room once in Kurdistan. Plaintiff Yousif Zandinan's mother died in Kurdistan.

943. ISIS looted and destroyed Plaintiff Yousif Zandinan's real and personal property.

944. As a result of ISIS's invasion, Plaintiff Yousif Zandinan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Ubayd Nafkosh, Khunaf Salaja, Isam Nafkosh, Sahar Nafkhosh, Sarab Nafkosh, Suad Nafkosh, Sabri Nafkosh, and I.N.**

945. Plaintiffs Ubayd Nafkosh, Khunaf Salaja, Isam Nafkosh, Sahar Nafkhosh, Sarab Nafkosh, Suad Nafkosh, Sabri Nafkosh, and I.N. are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Ubayd Nafkosh and Plaintiff Khunaf Salaja are married. Plaintiffs Isam Nafkosh, Sahar Nafkhosh, Sarab Nafkosh, Suad Nafkosh, Sabri Nafkosh, and I.N. are their children.

946. Plaintiffs Ubayd Nafkosh, Khunaf Salaja, Isam Nafkosh, Sahar Nafkhosh, Sarab Nafkosh, Suad Nafkosh, Sabri Nafkosh, and I.N. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

947. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khunaf Salaja fled to Sinjar Mountain with her children, including Plaintiffs Sahar Nafkhosh, Sarab Nafkosh, Suad Nafkosh, Sabri Nafkosh, and I.N., where they were trapped until they were able to escape to Kurdistan. Plaintiff Khunaf Salaja's siblings and their families and Plaintiff Ubayd Nafkhosh's parents, siblings, and their families also fled to Sinjar Mountain. Plaintiffs Ubayd Nafkosh and Isam Nafkosh fearfully followed their family's journey as they fled. Plaintiff Ubayd Nafkhosh's father was captured by ISIS, though he was later able to escape.

Plaintiff Khunaf Salaja's sister died on Sinjar Mountain. Plaintiff Ubayd Nafkosh's mother died shortly after leaving Sinjar Mountain, and his father died in Kurdistan.

948. ISIS looted and destroyed Plaintiffs Ubayd Nafkosh, Khunaf Salaja, Isam Nafkosh, Sahar Nafkosh, Sarab Nafkosh, Suad Nafkosh, Sabri Nafkosh, and I.N.'s real and personal property.

949. As a result of ISIS's invasion, Plaintiffs Ubayd Nafkosh, Khunaf Salaja, Isam Nafkosh, Sahar Nafkosh, Sarab Nafkosh, Suad Nafkosh, Sabri Nafkosh, and I.N. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Azad Aadi**

950. Plaintiff Azad Aadi is a citizen of the United States and domiciled in the state of Virginia.

951. Plaintiff Azad Aadi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

952. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq Plaintiff Azad Aadi's mother, brothers, and extended family fled to Kurdistan. Plaintiff Azad Aadi fearfully followed his family's journey as they fled. ISIS killed Plaintiff Azad Aadi's uncle. ISIS captured Plaintiff Azad Aadi's nieces and nephews, and two of his nephews are still missing.

953. ISIS looted and destroyed Plaintiff Azad Aadi's real and personal property.

954. As a result of ISIS's invasion, Plaintiff Azad Aadi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property, and/or the loss of his family's society and counsel.

**Kolo Dahar**

955. Plaintiff Kolo Dahar is a citizen of the United States and domiciled in the state of Nebraska.

956. Plaintiff Kolo Dahar has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

957. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Kolo Dahar's sisters and uncles fled to Kurdistan. Plaintiff Kolo Dahar fearfully followed his family's journey as they fled. ISIS captured and tortured Plaintiff Kolo Dahar's uncle until he was able to escape.

958. ISIS looted and destroyed Plaintiff Kolo Dahar's real and personal property.

959. As a result of ISIS's invasion, Plaintiff Kolo Dahar has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Barvi Ali**

960. Plaintiff Barvi Ali is a citizen of the United States and domiciled in the state of Nebraska.

961. Plaintiff Barvi Ali has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

962. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Barvi Ali's family, including her parents and brother, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Barvi Ali fearfully followed her family's journey as they fled. Plaintiff Barvi Ali's brother stepped on an IED, causing an

explosion. As a result, Plaintiff Barvi Ali's brother has had to undergo several major surgeries. Plaintiff Barvi Ali's nephew lost his leg. Plaintiff Barvi Ali's mother died in Kurdistan.

963. ISIS looted and destroyed Plaintiff Barvi Ali's real and personal property.

964. As a result of ISIS's invasion, Plaintiff Barvi Ali has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Elias Eedo**

965. Plaintiff Elias Eedo is a citizen of the United States and domiciled in the state of Nebraska.

966. Plaintiff Elias Eedo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

967. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Elias Eedo's family, including his parents, siblings, and grandmother, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Elias Eedo fearfully followed his family's journey as they fled. Plaintiff Elias Eedo's grandmother died several days after reaching Kurdistan. ISIS shot and injured Plaintiff Elias Eedo's brother-in-law.

968. ISIS looted and destroyed Plaintiff Elias Eedo's real and personal property.

969. As a result of ISIS's invasion, Plaintiff Elias Eedo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Dahham Haji**

970. Plaintiff Dahham Haji is a citizen of the United States and domiciled in the state of Nebraska.

971. Plaintiff Dahham Haji has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

972. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Dahham Haji and his parents, siblings, and brother's family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. ISIS killed Plaintiff Dahham Haji's grandmother, two uncles, aunt, and two cousins. Another of Plaintiff Dahham Haji's cousins died on Sinjar Mountain.

973. ISIS looted and destroyed Plaintiff Dahham Haji's real and personal property.

974. As a result of ISIS's invasion, Plaintiff Dahham Haji has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Laila Miho, Shahrstan Hami, Basima Hami, and Khokee Ahmed**

975. Plaintiffs Laila Miho, Shahrstan Hami, Basima Hami, and Khokee Ahmed are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Shahrstan Hami, Basima Hami, and Khokee Ahmed are sisters, and Plaintiff Laila Miho is their mother.

976. Plaintiffs Laila Miho, Shahrstan Hami, Basima Hami, and Khokee Ahmed have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

977. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Laila Miho, Shahrstan Hami, Basima Hami, and Khokee Ahmed fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Some of Plaintiffs Shahrstan Hami, Basima Hami, and Khokee Ahmed's siblings, their father, step-mother, and family remain in camps for internally displaced persons in Kurdistan. As a result of ISIS's

invasion, Plaintiff Laila Mohi suffered from depression, for which she still takes medication. As a result of the invasion, Plaintiff Shahrstan Hami was unable to finish school.

978. ISIS looted and destroyed Plaintiffs Laila Miho, Shahrstan Hami, Basima Hami, and Khokee Ahmed's real and personal property.

979. As a result of ISIS's invasion, Plaintiffs Laila Miho, Shahrstan Hami, Basima Hami, and Khokee Ahmed have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Hammood Aleeso**

980. Plaintiff Hammood Aleeso is a citizen of the United States and is domiciled in the state of Nebraska.

981. Plaintiff Hammood Aleeso has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

982. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hammood Aleeso and his family, including his parents, grandmother, siblings, aunts, and uncles, fled to Kurdistan. ISIS killed Plaintiff Hammood Aleeso's great-aunt who stayed behind. While they were on Sinjar Mountain, one of Plaintiff Hammood Aleeso's cousins returned to Sinjar and is still missing. As a result of the invasion, Plaintiff Hammood Aleeso developed and has been medicated for post-traumatic stress disorder.

983. ISIS looted and destroyed Plaintiff Hammood Aleeso's real and personal property.

984. As a result of ISIS's invasion, Plaintiff Hammood Aleeso has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.



**Ismaeil Hesso and Sari Meskin**

985. Plaintiffs Ismaeil Hesso and Sari Meskin are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Ismaeil Hesso and Plaintiff Sari Meskin are married.

986. Plaintiffs Ismaeil Hesso and Sari Meskin have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

987. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Ismaeil Hesso's siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Ismaeil Hesso and Sari Meskin fearfully followed their family's journey as they fled. ISIS killed two of Plaintiff Ismaeil Hesso's cousins. ISIS captured another of Plaintiff Ismaeil Hesso's cousins, who later died by suicide. ISIS killed Plaintiff Sari Meskin's grandfather and uncles, and posted videos of their killings on social media, which Plaintiff Sari Meskin watched. Plaintiff Sari Meskin now suffers from persistent abdominal pain following the invasion that requires medical attention.

988. ISIS looted and destroyed Plaintiffs Ismaeil Hesso and Sari Meskin's real and personal property.

989. As a result of ISIS's invasion, Plaintiffs Ismaeil Hesso and Sari Meskin have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Nadira Broka, Falah Rashoka, Hazim Rashawka, Ashwaq Rashawka, Khokhi Rashawka, Hala Rashoka, and Thawra Rashawka**

990. Plaintiffs Nadira Broka, Falah Rashoka, Hazim Rashawka, Ashwaq Rashawka, Khokhi Rashawka, Hala Rashoka, and Thawra Rashawka are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Falah Rashoka, Hazim Rashawka, Ashwaq

Rashawka, Khokhi Rashawka, Hala Rashoka, and Thawra Rashawka are siblings, and Plaintiff Nadira Broka is their mother.

991. Plaintiffs Nadira Broka, Falah Rashoka, Hazim Rashawka, Ashwaq Rashawka, Khokhi Rashawka, Hala Rashoka, and Thawra Rashawka have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

992. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Nadira Broka, Falah Rashoka, Hazim Rashawka, Ashwaq Rashawka, Khokhi Rashawka, Hala Rashoka, and Thawra Rashawka fled to Sinjar Mountain with Plaintiff Nadira Broka's family, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Falah Rashoka, Hazim Rashawka, Ashwaq Rashawka, Khokhi Rashawka, Hala Rashoka, and Thawra Rashawka's father (Plaintiff Nadia Broka's husband) experienced a suspected heart attack as they fled and died during the trip. ISIS captured more than twenty of Plaintiff Nadira Broka's relatives, with whom Plaintiff Nadira Broka was living in a family home, and killed nearly all of them.

993. ISIS looted and destroyed Plaintiffs Nadira Broka, Falah Rashoka, Hazim Rashawka, Ashwaq Rashawka, Khokhi Rashawka, Hala Rashoka, and Thawra Rashawka's real and personal property.

994. As a result of ISIS's invasion, Plaintiffs Nadira Broka, Falah Rashoka, Hazim Rashawka, Ashwaq Rashawka, Khokhi Rashawka, Hala Rashoka, and Thawra Rashawka have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Hussein Alisso and Laila Ayub**

995. Plaintiffs Hussein Alisso and Laila Ayub are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Hussein Alisso and Plaintiff Laila Ayub are married.

996. Plaintiffs Hussein Alisso and Laila Ayub have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

997. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Hussein Alisso and Laila Ayub fled to Kurdistan with their children. ISIS captured Plaintiff Hussein Alisso's aunt and her family and of them, two are presumed dead. ISIS held Plaintiff Laila Ayub's father captive, though he was later able to escape.

998. ISIS looted and destroyed Plaintiffs Hussein Alisso and Laila Ayub's real and personal property.

999. As a result of ISIS's invasion, Plaintiffs Hussein Alisso and Laila Ayub have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khaleel Mark**

1000. Plaintiff Khaleel Mark is a citizen of the United States and domiciled in the state of Nebraska.

1001. Plaintiff Khaleel Mark suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1002. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khaleel Mark's family, including his parents, siblings, and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Khaleel Mark fearfully followed his family's journey as they fled. Initially, Plaintiff Khaleel Mark

was not able to contact his family, and only after weeks he heard from his dad that his family had safely arrived in Kurdistan. Plaintiff Khaleel Mark's parents suffer from psychological issues since the invasion, and both receive medical treatment.

1003. ISIS looted and destroyed Plaintiff Khaleel Mark's real and personal property.

1004. As a result of ISIS's invasion, Plaintiff Khaleel Mark has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Shaima Abraham**

1005. Plaintiff Shaima Abraham is a citizen of the United States and domiciled in the state of Nebraska.

1006. Plaintiff Shaima Abraham has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1007. In particular, on or about August 3, 2014, during ISIS's invasion of Sinjar, Iraq, ISIS captured and beheaded Plaintiff Shaima Abraham's uncle and cousin. ISIS posted photos of the beheadings on social media, where Plaintiff Shaima Abraham saw them.

1008. ISIS looted and destroyed Plaintiff Shaima Abraham's real and personal property.

1009. As a result of ISIS's invasion, Plaintiff Shaima Abraham has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Khani Sharo and Naif Murad**

1010. Plaintiffs Khani Sharo and Naif Murad are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khani Sharo and Plaintiff Naif Murad are married.

1011. Plaintiffs Khani Sharo and Naif Murad have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1012. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khani Sharo, who was pregnant at the time, and Naif Murad fled to Kurdistan with Plaintiff Naif Murad's parents and siblings, and then to Turkey. Plaintiff Naif Murad's mother was injured during the escape and died a month later due to the injury. ISIS captured Plaintiff Khani Sharo's cousins and Plaintiff Naif Murad's brother, sister, and sister's family, though they were all later able to escape to Kurdistan.

1013. ISIS looted and destroyed Plaintiffs Khani Sharo and Naif Murad's real and personal property.

1014. As a result of ISIS's invasion, Plaintiffs Khani Sharo and Naif Murad have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Jamal Murad**

1015. Plaintiff Jamal Murad is a citizen of the United States and domiciled in the state of Nebraska.

1016. Plaintiff Jamal Murad has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1017. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Jamal Murad's family, including his siblings and uncles, fled to Sinjar Mountain, where they were trapped until they were able to escape to Syria and then to Kurdistan. Plaintiff Jamal Murad fearfully followed his family's journey as they fled. Plaintiff Jamal Murad's uncle stayed behind and was killed by ISIS.

1018. ISIS looted and destroyed Plaintiff Jamal Murad's real and personal property.

1019. As a result of ISIS's invasion, Plaintiff Jamal Murad has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Zaitoun Aldakhi**

1020. Plaintiff Zaitoun Aldakhi is a citizen of the United States and domiciled in the state of Nebraska.

1021. Plaintiff Zaitoun Aldakhi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1022. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Zaitoun Aldakhi's parents, siblings, including one sister who was pregnant, and their families fled to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan. Plaintiff Zaitoun Aldakhi fearfully followed her family's journey as they fled. Plaintiff Zaitoun Aldakhi's cousin and her four children were captured by ISIS but later escaped. ISIS killed Plaintiff Zaitoun Aldakhi's uncle. Plaintiff Zaitoun Aldakhi's sister died by suicide while in the camps for internally displaced persons. Plaintiff Zaitoun Aldakhi's father also died in the camps. Since the invasion, Plaintiff Zaitoun Aldakhi has developed depression.

1023. ISIS looted and destroyed Plaintiff Zaitoun Aldakhi's real and personal property.

1024. As a result of ISIS's invasion, Plaintiff Zaitoun Aldakhi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of her family's society and counsel.

**Mayan Smoki and Khalaf Khalaf**

1025. Plaintiffs Mayan Smoki and Khalaf Khalaf are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Mayan Smoki and Plaintiff Khalaf Khalaf are married.

1026. Plaintiffs Mayan Smoki and Khalaf Khalaf have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1027. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Mayan Smoki and Khalaf Khalaf fled with their children and Plaintiff Khalaf Khalaf's parents, siblings, and their families to Kurdistan. Plaintiffs Mayan Smoki and Khalaf Khalaf's daughter became sick on the day of the invasion and later died. ISIS killed Plaintiff Khalaf Khalaf's close relative.

1028. ISIS looted and destroyed Plaintiffs Mayan Smoki and Khalaf Khalaf's real and personal property.

1029. As a result of ISIS's invasion, Plaintiffs Mayan Smoki and Khalaf Khalaf have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khaleel Khalaf**

1030. Plaintiff Khaleel Khalaf is a citizen of the United States and domiciled in the state of Nebraska.

1031. Plaintiff Khaleel Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1032. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khaleel Khalaf's family, including his mother, siblings, and cousins, fled to

Kurdistan. Plaintiff Khaleel Khalaf fearfully followed his family's journey as they fled. ISIS killed Plaintiff Khaleel Khalaf's cousin.

1033. ISIS looted and destroyed Plaintiff Khaleel Khalaf's real and personal property.

1034. As a result of ISIS's invasion, Plaintiff Khaleel Khalaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Haidar Hesso**

1035. Plaintiff Haidar Hesso is a citizen of the United States and domiciled in the state of Nebraska.

1036. Plaintiff Haidar Hesso has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1037. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Haidar Hesso's brothers and their families fled to Sinjar Mountain. ISIS stopped them on the way and stole all their belongings. When ISIS was distracted, Plaintiffs Haidar Hesso's three brothers and their families were able to escape to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Haider Hesso fearfully followed his family's journey as they fled.

1038. ISIS looted and destroyed Plaintiff Haidar Hesso's real and personal property.

1039. As a result of ISIS's invasion, Plaintiff Haidar Hesso has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.



**Khounaf Shammo, Khaled Mourad, and Bashar Mourad**

1040. Plaintiffs Khounaf Shammo, Khaled Mourad, and Bashar Mourad are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khounaf Shammo is Plaintiffs Khaled Mourad and Bashar Mourad's mother.

1041. Plaintiffs Khounaf Shammo, Khaled Mourad, and Bashar Mourad have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1042. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khounaf Shammo, Khaled Mourad, and Bashar Mourad's family, including Plaintiff Khounaf Shammo's siblings and their children, fled to Kurdistan. Other members of their family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Khaled Mourad, Bashar Mourad, and Khounaf Shammo fearfully followed their family's journey as they fled. Just before fleeing, one of Plaintiff Khounaf Shammo's sister (Plaintiffs Khaled Mourad and Bashar Mourad's aunt) underwent surgery, and she died shortly after arriving in Kurdistan due to the difficult journey. Plaintiff Khounaf Shammo developed depression and chronic back pain following the invasion.

1043. ISIS looted and destroyed Plaintiffs Khounaf Shammo, Khaled Mourad, and Bashar Mourad's real and personal property.

1044. As a result of ISIS's invasion, Plaintiffs Khounaf Shammo, Khaled Mourad, and Bashar Mourad have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Kawwal Hasan, Kamla Shammo, Laila Khoudeida, Nafiya Khoudeida, and Khaeiri Khoudeida**

1045. Plaintiffs Kawwal Hasan, Kamla Shammo, Laila Khoudeida, Nafiya Khoudeida, and Khaeiri Khoudeida are citizens of the United States and domiciled in the state of Nebraska.

Plaintiff Kawwal Hasan and Plaintiff Kamla Shammo are married. Plaintiffs Laila Khoudeida, Nafiya Khoudeida, and Khaeiri Khoudeida are their children.

1046. Plaintiffs Kawwal Hasan, Kamla Shammo, Laila Khoudeida, Nafiya Khoudeida, and Khaeiri Khoudeida have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1047. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Kawwal Hasan and Kamla Shammo's son (Plaintiffs Laila Khoudeida, Nafiya Khoudeida, and Khaeiri Khoudeida's brother) fled to Kurdistan while their sisters, brothers, and their families fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Kawwal Hasan, Kamla Shammo, Laila Khoudeida, Nafiya Khoudeida, and Khaeiri Khoudeida fearfully followed their family's journey as they fled. ISIS killed eight of Plaintiff Kawwal Hasan's close relatives and captured Plaintiff Kamla Shammo's sister and her child. Several of Plaintiff Kawwal Hasan's family members fought ISIS during and after the invasion. Plaintiff Kamla Shammo's nephew died on the mountain. ISIS captured Plaintiff Kamla Shammo's pregnant niece and her niece's family. Plaintiff Kamla Shammo's niece gave birth in captivity and was only able to escape after three years. Another of Plaintiff Kamla Shammo's nieces died from suicide by setting herself on fire while she was trapped on Sinjar Mountain. Two of Plaintiff Kamla Shammo's uncles and cousins died in the camps for internally displaced persons. Plaintiff Kamla Shammo subsequently needed heart surgery and now has a pacemaker and suffers from depression and poor mental health following the invasion.

1048. ISIS looted and destroyed Plaintiffs Kawwal Hasan, Kamla Shammo, Laila Khoudeida, Nafiya Khoudeida, and Khaeiri Khoudeida's real and personal property.

1049. As a result of ISIS's invasion, Plaintiffs Kawwal Hasan, Kamla Shammo, Laila Khoudeida, Nafiya Khoudeida, and Khaeiri Khoudeida have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property, and/or loss of their family's society and counsel.

**Sardar Almahama, Naseema Dinai, Dler Almahama, Rojeen Almahama, S.A., and D.A.**

1050. Plaintiffs Sardar Almahama, Naseema Dinai, Dler Almahama, Rojeen Almahama, S.A., and D.A. are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Sardar Almahama and Plaintiff Naseema Dinai are married and Plaintiffs Dler Almahama, Rojeen Almahama, S.A., and D.A. are their children.

1051. Plaintiffs Sardar Almahama, Naseema Dinai, Dler Almahama, Rojeen Almahama, S.A., and D.A. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1052. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Sardar Almahama, Naseema Dinai, their children, including Plaintiffs Dler Almahama, who was disabled, Rojeen Almahama, S.A., and D.A., and other family members fled to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan. While on the mountain, Plaintiff Dler Almahama did not have access to his necessary medications. ISIS killed Plaintiff Naseema Dinai's grandmother, uncle, and some of her cousins. ISIS killed some of Plaintiff Sardar Almahama cousins. ISIS captured Plaintiff Sardar Almahama's grandmother, who escaped but died soon after. ISIS also captured Plaintiff Sardar Almahama's uncle, and he is still missing. Plaintiff Naseema Dinai now suffers from anxiety and depression due to the invasion. Plaintiff Rojeen Almahama suffers from nightmares as a result of the invasion.

1053. ISIS looted and destroyed Plaintiffs Sardar Almahama, Naseema Dinai, Dler Almahama, Rojeen Almahama, S.A., and D.A's real and personal property.

1054. As a result of ISIS's invasion, Plaintiffs Sardar Almahama, Naseema Dinai, Dler Almahama, Rojeen Almahama, S.A., and D.A's have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Sabah Zaido**

1055. Plaintiff Sabah Zaido is a citizen of the United States and domiciled in the state of Nebraska.

1056. Plaintiff Sabah Zaido has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1057. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sabah Zaido's daughter fled to Kurdistan. Plaintiff Sabah Zaido's extended family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Sabah Zaido fearfully followed his family's journey as they fled. Plaintiff Sabah Zaido's cousin was injured and died on Sinjar Mountain.

1058. ISIS looted and destroyed Plaintiff Sabah Zaido's real and personal property.

1059. As a result of ISIS's invasion, Plaintiff Sabah Zaido has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Fahad Naif**

1060. Plaintiff Fahad Naif is a citizen of the United States and domiciled in the state of Nebraska.

1061. Plaintiff Fahad Naif has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1062. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Fahad Naif fled to Sinjar Mountain with his parents, sisters, and brothers, where they were trapped until they were able to escape to Kurdistan.

1063. ISIS looted and destroyed Plaintiff Fahad Naif's real and personal property.

1064. As a result of ISIS's invasion, Plaintiff Fahad Naif has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Kamal Bakr**

1065. Plaintiff Kamal Bakr is a citizen of the United States and domiciled in the state of Nebraska.

1066. Plaintiff Kamal Bakr has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1067. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Kamal Bakr's family, including his parents, siblings, aunts, and uncles, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Kamal Bakr fearfully followed his family's journey as they fled. ISIS captured Plaintiff Kamal Bakr's sister and her family, including her two infant children. They managed to escape during a U.S. airstrike after spending approximately one month in captivity. Since the invasion, Plaintiff Kamal Bakr suffers from anxiety and depression, which have affected his ability to work.

1068. ISIS looted and destroyed Plaintiff Kamal Bakr's real and personal property.

1069. As a result of ISIS's invasion, Plaintiff Kamal Bakr has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Qasim Samoqi**

1070. Plaintiff Qasim Samoqi is a citizen of the United States and domiciled in the state of Nebraska.

1071. Plaintiff Qasim Samoqi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1072. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Qasim Samoqi fled to Kurdistan with his mother, brother, uncle, and their families. Plaintiff Qasim Samoqi's mother developed depression and died following the invasion.

1073. ISIS looted and destroyed Plaintiff Qasim Samoqi's real and personal property.

1074. As a result of ISIS's invasion, Plaintiff Qasim Samoqi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Saleh Saleh**

1075. Plaintiff Saleh Saleh is a citizen of the United States and domiciled in the state of Nebraska.

1076. Plaintiff Saleh Saleh has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1077. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saleh Saleh's family, including his parents, siblings, and their families, fled to

Kurdistan. Plaintiff Saleh Saleh fearfully followed his family's journey as they fled. ISIS captured two of Plaintiff Saleh Saleh's brothers-in-law, though they were later able to escape.

1078. ISIS looted and destroyed Plaintiff Saleh Saleh's real and personal property.

1079. As a result of ISIS's invasion, Plaintiff Saleh Saleh has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Tahseen Osman**

1080. Plaintiff Tahseen Osman is a citizen of the United States and domiciled in the state of Texas.

1081. Plaintiff Tahseen Osman has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1082. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Tahseen Osman's siblings and their families fled to Kurdistan. Plaintiff Tahseen Osman fearfully followed his family's journey as they fled. ISIS captured Plaintiff Tahseen Osman's uncle and cousin, who are still missing. ISIS captured another of Plaintiff Tahseen Osman's uncles, but he managed to escape.

1083. ISIS looted and destroyed Plaintiff Tahseen Osman's real and personal property.

1084. As a result of ISIS's invasion, Plaintiff Tahseen Osman has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Joanne Osman**

1085. Plaintiff Joanne Osman is a citizen of the United States and domiciled in the state of Texas.

1086. Plaintiff Joanne Osman has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1087. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Joanne Osman's family, including her brother, his family, and her brother's parents-in-law, fled to Sinjar Mountain and then on to Kurdistan. Plaintiff Joanne Osman's parents and youngest sister were held by ISIS in their house in Sinjar for about 10 days until they were able to escape to Kurdistan. Plaintiff Joanne Osman's stepmother and stepsiblings were trapped in a village for weeks until they were able to escape to Kurdistan. Plaintiff Joanne Osman fearfully followed her family's journey as they fled. ISIS captured Plaintiff Joanne Osman's uncle, aunt, and cousins. Three of her female cousins were able to escape after about one year in ISIS captivity. Her uncle and one male cousin remain missing to this day. Since the invasion, Plaintiff Joanne Osman suffers from mental and physical health issues, including migraines and nightmares.

1088. ISIS looted and destroyed Plaintiff Joanne Osman's real and personal property.

1089. As a result of ISIS's invasion, Plaintiff Joanne Osman has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Saeed Kalo**

1090. Plaintiff Saeed Kalo is a citizen of the United States and domiciled in the state of Texas.

1091. Plaintiff Saeed Kalo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1092. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saeed Kalo's parents, siblings, and their families fled to Sinjar Mountain, where



they were trapped until they were able to escape to Kurdistan. Plaintiff Saeed Kalo fearfully followed his family's journey as they fled. Plaintiff Saeed Kalo's father, mother, and sister later developed health issues that required medical treatment.

1093. ISIS looted and destroyed Plaintiff Saeed Kalo's real and personal property.

1094. As a result of ISIS's invasion, Plaintiff Saeed Kalo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Mazen Suleiman, Zubada Khudada, Halfeen Khudada, Deleer Khudada, S.K., and P.K.**

1095. Plaintiffs Mazen Suleiman, Zubada Khudada, Halfeen Khudada, Deleer Khudada, S.K., and P.K. are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Mazen Suleiman is the father of Plaintiffs Zubada Khudada, Halfeen Khudada, Deleer Khudada, S.K., and P.K.

1096. Plaintiffs Mazen Suleiman, Zubada Khudada, Halfeen Khudada, Deleer Khudada, S.K., and P.K. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1097. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Mazen Suleiman, Zubada Khudada, Halfeen Khudada, Deleer Khudada, S.K., and P.K. fled to Kurdistan with Plaintiff Mazen Suleiman's wife (Plaintiff Zubada Khudada, Halfeen Khudada, Deleer Khudada, S.K., and P.K.'s mother). Plaintiff Mazen Suleiman now suffers from severe stress and physical health issues following the invasion.

1098. ISIS looted and destroyed Plaintiffs Mazen Suleiman, Zubada Khudada, Halfeen Khudada, Deleer Khudada, S.K., and P.K.'s real and personal property.

1099. 735. As a result of ISIS's invasion, Plaintiffs Mazen Suleiman, Zubada Khudada, Halfeen Khudada, Deleer Khudada, S.K., and P.K. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Munefah Murad**

1100. Plaintiff Munefah Murad is a citizen of the United States and domiciled in the state of Nebraska.

1101. Plaintiff Munefah Murad has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1102. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Munefah Murad's family, including her mother, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Munefah Murad fearfully followed her family's journey as they fled. Plaintiff Munefah Murad's mother died on Sinjar Mountain. ISIS captured and killed Plaintiff Munefah Murad's uncle and cousin.

1103. ISIS looted and destroyed Plaintiff Munefah Murad's real and personal property.

1104. As a result of ISIS's invasion, Plaintiff Munefah Murad has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Sabah Hasan**

1105. Plaintiff Sabah Hasan is a citizen of the United States and domiciled in the state of Nebraska.

1106. Plaintiff Sabah Hasan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1107. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sabah Hasan's family, including his wife, daughter, mother, and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Sabah Hasan fearfully followed his family's journey as they fled. ISIS captured Plaintiff Sabah Hasan's father, who is still missing.

1108. ISIS looted and destroyed Plaintiff Sabah Hasan's real and personal property.

1109. As a result of ISIS's invasion, Plaintiff Sabah Hasan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Shirwan Chicho**

1110. Plaintiff Shirwan Chicho is a citizen of the United States and domiciled in the state of Nebraska.

1111. Plaintiff Shirwan Chicho has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1112. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Shirwan Chicho's sisters and their families fled to Kurdistan. Plaintiff Shirwan Chicho fearfully followed his family's journey as they fled. Since the invasion, Plaintiff Shirwan Chicho has had difficulty sleeping.

1113. ISIS looted and destroyed Plaintiff Shirwan Chicho's real and personal property.

1114. As a result of ISIS's invasion, Plaintiff Shirwan Chicho has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Aeid Hamo**

1115. Plaintiff Aeid Hamo is a citizen of the United States and domiciled in the state of Nebraska.

1116. Plaintiffs Aeid Hamo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1117. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Aeid Hamo fled to Kurdistan with his parents, siblings, grandparents, uncles, and cousins.

1118. ISIS looted and destroyed Plaintiff Aeid Hamo's real and personal property.

1119. As a result of ISIS's invasion, Plaintiff Aeid Hamo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Alex Ismail and Muhsin Holki**

1120. Plaintiffs Alex Ismail and Muhsin Holki are citizens of the United States and domiciled in the state of Texas. Plaintiffs Alex Ismail and Muhsin Holki are brothers.

1121. Plaintiffs Alex Ismail and Muhsin Holki have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1122. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Muhsin Holki fled to Sinjar Mountain with his grandmother, parents, siblings, and their families, where they were trapped until they were able to escape to Kurdistan. Plaintiff Alex Ismail fearfully followed his family's journey as they fled. ISIS captured and killed Plaintiffs Alex Ismail and Muhsin Holki's cousin.

1123. ISIS looted and destroyed Plaintiff Alex Ismail and Muhsin Holki's real and personal property.

1124. As a result of ISIS's invasion, Plaintiffs Alex Ismail and Muhsin Holki have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ricky Namer**

1125. Plaintiff Ricky Namer is a citizen of the United States and domiciled in the state of Texas.

1126. Plaintiff Ricky Namer has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1127. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ricky Namer's parents, brothers, and their families fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Ricky Namer fearfully followed his family's journey as they fled. Plaintiff Ricky Namer's nephew died in Kurdistan. Plaintiff Ricky Namer now suffers from trauma, depression, and insomnia following the invasion.

1128. ISIS looted and destroyed Plaintiff Ricky Namer's real and personal property.

1129. As a result of ISIS's invasion, Plaintiff Ricky Namer has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Asinja Badeel, Nanssy Elias and Alvin Khidir**

1130. Plaintiffs Asinja Badeel, Nanssy Elias and Alvin Khidir are citizens of the United States and domiciled in the state of Texas. Plaintiff Asinja Badeel is the mother of Plaintiffs Nanssy Elias and Alvin Khidir.

1131. Plaintiffs Asinja Badeel, Nanssy Elias and Alvin Khidir have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1132. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Asinja Badeel's parents, siblings, and their families (Plaintiffs Nanssy Elias and Alvin Khidir's grandparents, aunts, uncles, and their families) fled to Kurdistan. Plaintiffs Asinja Badeel, Nanssy Elias and Alvin Khidir fearfully followed their family's journey as they fled. Plaintiff Asinja Badeel's father suffered a stroke while escaping and half of his body was permanently paralyzed until he passed away. Plaintiff Asinja Badeel now suffers from depression following the invasion. Due to the invasion, Plaintiff Nanssy Elias was diagnosed with depression, anxiety, and obsessive-compulsive disorder for which she had to take medications and seek therapy.

1133. ISIS looted and destroyed Plaintiffs Asinja Badeel, Nanssy Elias and Alvin Khidir's real and personal property

1134. As a result of ISIS's invasion, Plaintiffs Asinja Badeel, Nanssy Elias and Alvin Khidir have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Sinobar Badeel and Laith Saleem**

1135. Plaintiffs Sinobar Badeel and Laith Saleem are citizens of the United States and domiciled in the state of Texas. Plaintiffs Sinobar Badeel and Laith Saleem are married.

1136. Plaintiffs Sinobar Badeel and Laith Saleem have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1137. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Sinobar Badeel and Laith Saleem fled to Kurdistan with their children, parents, and

siblings. Plaintiff Sinobar Badeel's father suffered a stroke while escaping and half of his body is now permanently paralyzed. Shortly before August 3, 2014, ISIS bombed Plaintiff Laith Saleem's store in Bashiqa, Iraq, and Plaintiff Laith Saleem barely survived. Plaintiffs Sinobar Badeel and Laith Saleem now suffer from nightmares following the invasion.

1138. ISIS looted and destroyed Plaintiffs Sinobar Badeel and Laith Saleem's real and personal property.

1139. As a result of ISIS's invasion, Plaintiffs Sinobar Badeel and Laith Saleem have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Adil Khalaf and Khonaf Haskan**

1140. Plaintiffs Adil Khalaf and Khonaf Haskan are citizens of the United States and domiciled in the state of Ohio. Plaintiffs Adil Khalaf and Khonaf Haskan are married.

1141. Plaintiffs Adil Khalaf and Khonaf Haskan have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1142. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Adil Khalaf's family, including his siblings and their families, and Plaintiff Khonaf Haskan's family, including her parents, siblings, uncles, aunts, and their families, fled to Kurdistan. One of Plaintiff Khonaf Haskan's sisters and her family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Adil Khalaf and Khonaf Haskan fearfully followed their families' journey as they fled. Plaintiff Adil Khalaf's cousin was disabled and could not flee, and was killed by ISIS. Plaintiff Khonaf Haskan's father had a broken leg and had to be put in a wheelbarrow and pushed from their village to Kurdistan. One of Plaintiff Khonaf Haskan's nephews suffered from extreme thirst and still suffers from related complications

to this day. Plaintiff Khonaf Haskan was hospitalized for three days because of the stress from the invasion.

1143. ISIS looted and destroyed Plaintiff Adil Khalaf and Khonaf Haskan's real and personal property.

1144. As a result of ISIS's invasion, Plaintiff Adil Khalaf and Khonaf Haskan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of family's society and counsel.

**Salih Saado**

1145. Plaintiff Salih Saado is a citizen of the United States and domiciled in the state of Virginia.

1146. Plaintiff Salih Saado has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1147. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Salih Saado's family, including his mother and siblings, fled to Kurdistan. Plaintiff Salih Saado fearfully followed his family's journey as they fled.

1148. ISIS looted and destroyed Plaintiff Salih Saado's real and personal property.

1149. As a result of ISIS's invasion, Plaintiff Salih Saado has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Faris Saado**

1150. Plaintiff Faris Saado is a citizen of the United States and domiciled in the state of Virginia.



1151. Plaintiff Faris Saado has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1152. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Faris Saado's daughter and sister fled to Kurdistan. Plaintiff Faris Saado fearfully followed his family's journey as they fled.

1153. ISIS looted and destroyed Plaintiff Faris Saado's real and personal property.

1154. As a result of ISIS's invasion, Plaintiff Faris Saado has experienced economic loss; severe mental anguish; extreme emotional pain and suffering, loss of property; and/or loss of his family's society and counsel.

**Fakhri Kassem, Laila Kassem, Fatin Kassem, and Nahrein Kassem**

1155. Plaintiffs Fakhri Kassem, Laila Kassem, Fatin Kassem, and Nahrein Kassem are citizens of the United States and domiciled in the state of Washington. Plaintiffs Fakhri Kassem and Laila Kassem are married, and Fatin Kassem and Nahrein Kassem are their daughters.

1156. Plaintiff Fakhri Kassem, Laila Kassem, Fatin Kassem, and Nahrein Kassem have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1157. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Fakhri Kassem's family, including his uncles and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Laila Kassem's family, including her siblings and their families, fled directly to Kurdistan. Plaintiffs Fakhri Kassem, Laila Kassem, Fatin Kassem, and Nahrein Kassem fearfully followed their family's journey as they fled. ISIS killed two of Plaintiff Fakhri Kassem's cousins. Plaintiff Fakhri Kassem now suffers from several health conditions, including high blood pressure, a stroke, diabetes, and difficulty sleeping following the invasion.

1158. ISIS looted and destroyed Plaintiffs Fakhri Kassem, Laila Kassem, Fatin Kassem, and Nahrein Kassem's real and personal property.

1159. As a result of ISIS's invasion, Plaintiffs Fakhri Kassem, Laila Kassem, Fatin Kassem, and Nahrein Kassem have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**James Abdy**

1160. Plaintiff James Abdy is a citizen of the United States and domiciled in the state of Texas.

1161. Plaintiff James Abdy has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1162. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff James Abdy's family, including his parents and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff James Abdy fearfully followed his family's journey as they fled. ISIS fighters shot at Plaintiff James Abdy's family when they tried to leave the mountain. Two of Plaintiff James Abdy's brothers now suffer from severe trauma that affects their functioning following the invasion. Plaintiff James Abdy has experienced trouble focusing following the invasion, which has affected his livelihood and personal life, including by preventing him from maintaining his businesses in the United States.

1163. ISIS looted and destroyed Plaintiff James Abdy's real and personal property.

1164. As a result of ISIS's invasion, Plaintiff James Abdy has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Jndy Smoqi**

1165. Plaintiff Jndy Smoqi is a citizen of the United States and domiciled in the state of Nebraska.

1166. Plaintiff Jndy Smoqi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1167. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Jndy Smoqi fled to Kurdistan with his wife, wife's parents, brother, and sister-in-law.

1168. ISIS looted and destroyed Plaintiff Jndy Smoqi's real and personal property.

1169. As a result of ISIS's invasion, Plaintiff Jndy Smoqi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Nadima Ato and Sami Smoqi**

1170. Plaintiffs Nadima Ato and Sami Smoqi are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Nadima Ato is Plaintiff Sami Smoqi's mother.

1171. Plaintiffs Nadima Ato and Sami Smoqi have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1172. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Nadima Ato and Sami Smoqi fled to Sinjar Mountain with Plaintiff Sami Smoqi's siblings, where they were trapped until they were able to escape to Kurdistan.

1173. ISIS looted and destroyed Plaintiffs Nadima Ato and Sami Smoqi's real and personal property.

1174. As a result of ISIS's invasion, Plaintiffs Nadima Ato and Sami Smoqi have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Hussein Kheder**

1175. Plaintiff Hussein Kheder is a citizen of the United States and domiciled in the state of Nebraska.

1176. Plaintiff Hussein Kheder has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1177. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Hussein Kheder's family, including his sister and her family, his stepmother, aunts and cousins, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hussein Kheder fearfully followed his family's journey as they fled. One of Plaintiff Hussein Kheder's cousins fought alongside other Yazidis against ISIS. Since the invasion, Plaintiff Hussein Kheder has suffered from mental health issues, and has volunteered in camps for internally displaced persons in Kurdistan.

1178. ISIS looted and destroyed Plaintiff Hussein Kheder's real and personal property.

1179. As a result of ISIS's invasion, Plaintiff Hussein Kheder has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Saadoon Smoqi and Sulaiman Hasan**

1180. Plaintiffs Saadoon Smoqi and Sulaiman Hasan are citizens of the United States and domiciled in the state of Indiana. Plaintiffs Saadoon Smoqi and Sulaiman Hasan are brothers.

1181. Plaintiffs Saadoon Smoqi and Sulaiman Hasan have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1182. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Saadoon Smoqi and Sulaiman Hasan fled to Kurdistan with their sister and her family. Other members of Plaintiffs Saadoon Smoqi and Sulaiman Hasan's family fled to Sinjar Mountain, where they were trapped until they were able to escape.

1183. ISIS looted and destroyed Plaintiffs Saadoon Smoqi and Sulaiman Hasan's real and personal property.

1184. As a result of ISIS's invasion, Plaintiffs Saadoon Smoqi and Sulaiman Hasan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khani Rafo**

1185. Plaintiff Khani Rafo is a citizen of the United States and domiciled in the state of Indiana.

1186. Plaintiff Khani Rafo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1187. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khani Rafo fled to Kurdistan with her parents and siblings.

1188. ISIS looted and destroyed Plaintiff Khani Rafo's real and personal property.

1189. As a result of ISIS's invasion, Plaintiff Khani Rafo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Haneef Smoqi**

1190. Plaintiff Haneef Smoqi is a citizen of the United States and domiciled in the state of Indiana.

1191. Plaintiff Haneef Smoqi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1192. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Haneef Smoqi fled to Kurdistan with her brother and uncle. Plaintiff Haneef Smoqi's parents, sisters, and brothers fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. ISIS captured Plaintiff Haneef Smoqi's father's cousin's families, and some of them are still in captivity.

1193. ISIS looted and destroyed Plaintiff Haneef Smoqi's real and personal property.

1194. As a result of ISIS's invasion, Plaintiff Haneef Smoqi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Saadun Issa**

1195. Plaintiff Saadun Issa is a citizen of the United States and domiciled in the state of Texas.

1196. Plaintiff Saadun Issa has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1197. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saadun Issa's family, including his mother, brothers, and their families, fled to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan. Plaintiff Saadun

Issa fearfully followed his family's journey as they fled. Plaintiff Saadun Issa's aunt died while fleeing from ISIS.

1198. ISIS looted and destroyed Plaintiff Saadun Issa's real and personal property.

1199. As a result of ISIS's invasion, Plaintiff Saadun Issa has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Saeed Issa and Hadeel Sarhan**

1200. Plaintiffs Saeed Issa and Hadeel Sarhan are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Saeed Issa and Hadeel Sarhan are married.

1201. Plaintiffs Saeed Issa and Hadeel Sarhan have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1202. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Saeed Issa and Hadeel Sarhan fled to Sinjar Mountain with their children and Plaintiff Saeed Issa's mother and brothers, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hadeel Sarhan was pregnant when ISIS invaded Sinjar and she had to give birth a few days after they reached Kurdistan. Plaintiff Saeed Issa's aunt died on Sinjar Mountain.

1203. ISIS looted and destroyed Plaintiffs Saeed Issa and Hadeel Sarhan's real and personal property.

1204. As a result of ISIS's invasion, Plaintiffs Saeed Issa and Hadeel Sarhan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Sheren Auso and Serdar Auso**

1205. Plaintiffs Sheren Auso and Serdar Auso are citizens of the United States and domiciled in the state of Washington. Plaintiff Sheren Auso and Plaintiff Serdar Auso are married.

1206. Plaintiffs Sheren Auso and Serdar Auso have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1207. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Sheren Auso and Serdar Auso fled to Kurdistan with their children, Plaintiff Sheren Auso's parents, and Plaintiff Serdar Auso's brothers. ISIS captured and buried alive two of Plaintiff Serdar Auso's uncles. ISIS killed Plaintiff Sheren Auso's parents' relatives. Plaintiffs Sheren Auso and Serdar Auso both have been diagnosed with depression and suffer from insomnia and anxiety following the invasion.

1208. ISIS looted and destroyed Plaintiffs Sheren Auso and Serdar Auso's real and personal property.

1209. As a result of ISIS's invasion, Plaintiffs Sheren Auso and Serdar Auso have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Basil Auso**

1210. Plaintiff Basil Auso is a citizen of the United States and domiciled in the state of Washington.

1211. Plaintiff Basil Auso has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1212. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Basil Auso's family, including his parents, grandmother, siblings, and their families,



fled to Kurdistan. Plaintiff Basil Auso fearfully followed his family's journey as they fled. ISIS attacked Plaintiff Basil Auso's family while on their journey to Kurdistan. ISIS captured and buried alive Plaintiff Basil Auso's two uncles.

1213. ISIS looted and destroyed Plaintiff Basil Auso's real and personal property.

1214. As a result of ISIS's invasion, Plaintiff Basil Auso has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Steven Auso**

1215. Plaintiff Steven Auso is a citizen of the United States and domiciled in the state of Washington.

1216. Plaintiff Steven Auso has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1217. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Steven Auso fled to Kurdistan with his parents, siblings, and their families. ISIS captured and buried alive two of Plaintiff Steven Auso's uncles. Plaintiff Steven Auso has been diagnosed with depression and suffers from insomnia and anxiety following the invasion.

1218. ISIS looted and destroyed Plaintiff Steven Auso's real and personal property.

1219. As a result of ISIS's invasion, Plaintiff Steven Auso has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hassan Ali, Kori Sharro, Rose Osman, Basseh Osman, Ajaj Osman, Falah Osman, Amal Osman, Husein Osman, Sanaa Osman, Samerah Osman, and Salah Osman**

1220. Plaintiffs Hassan Ali, Kori Sharro, Rose Osman, Basseh Osman, Ajaj Osman, Falah Osman, Amal Osman, Husein Osman, Sanaa Osman, Samerah Osman, and Salah Osman are

citizens of the United States and domiciled in the state of Nebraska. Plaintiff Hassan Ali and Kori Sharro are the parents of Plaintiffs Rose Osman, Basseh Osman, Ajaj Osman, Falah Osman, Amal Osman, Husein Osman, Sanaa Osman, Samerah Osman, and Salah Osman.

1221. Plaintiffs Hassan Ali, Kori Sharro, Rose Osman, Basseh Osman, Ajaj Osman, Falah Osman, Amal Osman, Husein Osman, Sanaa Osman, Samerah Osman, and Salah Osman have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1222. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hassan Ali's family, including his sisters, uncles, cousins, and wife's family fled to Kurdistan. Plaintiffs Hassan Ali, Kori Sharro, Rose Osman, Basseh Osman, Ajaj Osman, Falah Osman, Amal Osman, Husein Osman, Sanaa Osman, Samerah Osman, and Salah Osman fearfully followed their family's journey as they fled. ISIS captured Plaintiff Hassan Ali's cousin and his cousin's daughter.

1223. ISIS looted and destroyed Plaintiffs Hassan Ali, Kori Sharro, Rose Osman, Basseh Osman, Ajaj Osman, Falah Osman, Amal Osman, Husein Osman, Sanaa Osman, Samerah Osman, and Salah Osman's real and personal property.

1224. As a result of ISIS's invasion, Plaintiffs Hassan Ali, Kori Sharro, Rose Osman, Basseh Osman, Ajaj Osman, Falah Osman, Amal Osman, Husein Osman, Sanaa Osman, Samerah Osman, and Salah Osman have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ismael Khro and Khaula Saeed**

1225. Plaintiffs Ismael Khro and Khaula Saeed are citizens of the United States and domiciled in the state of Washington. Plaintiffs Ismael Khro and Khaula Saeed are married.

1226. Plaintiffs Ismael Khro and Khaula Saeed have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1227. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ismael Khro's mother and siblings fled to Kurdistan. Plaintiff Khaula Saeed's family, including her parents and siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Ismael Khro and Khaula Saeed fearfully followed their family's journey as they fled. ISIS captured Plaintiff Khaula Saeed's aunt, uncle, and cousins. Three of her female cousins were in ISIS captivity for years. Plaintiff Khaula Saeed's uncle and one male cousin remain missing to this day. Since the invasion Plaintiff Khaula Saeed suffers from mental and physical health issues. Plaintiff Ismael Khro has sought mental health treatment, including therapy and medication, following the invasion.

1228. ISIS looted and destroyed Plaintiffs Ismael Khro and Khaula Saeed's real and personal property.

1229. As a result of ISIS's invasion, Plaintiffs Ismael Khro and Khaula Saeed have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khairi Shammo**

1230. Plaintiff Khairi Shammo is a citizen of the United States and domiciled in the state of Virginia.

1231. Plaintiff Khairi Shammo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1232. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khairi Shammo's family, including his parents, brothers, grandparents, uncles, and

cousins fled to Kurdistan and then to Turkey. Plaintiff Khairi Shammo fearfully followed his family's journey as they fled. Plaintiff Khairi Shammo's grandmother died in a camp for internally displaced persons in Turkey later that year.

1233. ISIS looted and destroyed Plaintiff Khairi Shammo's real and personal property.

1234. As a result of ISIS's invasion, Plaintiff Khairi Shammo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Amal Hasan**

1235. Plaintiff Amal Hasan is a citizen of the United States and domiciled in the state of Nebraska.

1236. Plaintiff Amal Hasan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1237. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Amal Hasan fled to Kurdistan with her parents, brothers, and sisters. Plaintiff Amal Hasan's grandparents also fled to Kurdistan, and later died in a camp for internally displaced persons.

1238. ISIS looted and destroyed Plaintiff Amal Hasan's real and personal property.

1239. As a result of ISIS's invasion, Plaintiff Amal Hasan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of her family's society and counsel.

**Wadhhah Alesou and Layla Ibrahim**

1240. Plaintiffs Wadhhah Alesou and Layla Ibrahim are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Wadhhah Alesou is Plaintiff Layla Ibrahim's mother.

1241. Plaintiffs Wadhhah Alesou and Layla Ibrahim have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1242. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Wadhhah Alesou and Layla Ibrahim fled to Kurdistan with other members of their family. ISIS captured and killed several of Plaintiff Wadhhah Alesou's relatives. ISIS captured Plaintiff Layla Ibrahim's father's uncle's family, including his son and three daughters. The daughters have since escaped, but her uncle and cousin are still missing. Plaintiff Wadhhah Alesou has sought mental health treatment and has been prescribed medication following the invasion.

1243. ISIS looted and destroyed Plaintiffs Wadhhah Alesou and Layla Ibrahim's real and personal property.

1244. As a result of ISIS's invasion, Plaintiffs Wadhhah Alesou and Layla Ibrahim have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Suad Khider**

1245. Plaintiff Suad Khider is a citizen of the United States and domiciled in the state of Nebraska.

1246. Plaintiff Suad Khider has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1247. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Suad Khider fled to Kurdistan with her family. Following their escape, Plaintiff Suad Khider's father died of a heart attack due to the stress of the invasion. The following year, while trying to flee to Germany, nine members of Plaintiff Suad Khider's family, including two of her

brothers and their families, drowned. Since the invasion, Plaintiff Suad Khider suffers from depression, for which she receives ongoing treatment.

1248. ISIS looted and destroyed Plaintiff Suad Khider's real and personal property.

1249. As a result of ISIS's invasion, Plaintiff Suad Khider has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Khalid Khalaf**

1250. Plaintiff Khalid Khalaf is a citizen of the United States and domiciled in the state of Nebraska.

1251. Plaintiff Khalid Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1252. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khalid Khalaf's mother and siblings fled to Kurdistan and then to Turkey and Germany. Plaintiff Khalid Khalaf fearfully followed his family's journey as they fled.

1253. ISIS looted and destroyed Plaintiff Khalid Khalaf's real and personal property.

1254. As a result of ISIS's invasion, Plaintiff Khalid Khalaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Azeezah Arab**

1255. Plaintiff Azeezah Arab is a citizen of the United States and domiciled in the state of Nebraska.

1256. Plaintiff Azeezah Arab has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1257. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Azeezah Arab's family, including her uncles and cousins, fled to Turkey. Plaintiff Azeezah fearfully followed her family's journey as they fled. One of Plaintiff Azeezah Arab's cousins and his family went missing while fleeing to Turkey, and they are still missing.

1258. ISIS looted and destroyed Plaintiff Azeezah Arab's real and personal property.

1259. As a result of ISIS's invasion, Plaintiff Azeezah Arab has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Huda Jasso**

1260. Plaintiff Huda Jasso is a citizen of the United States and domiciled in the state of Nebraska.

1261. Plaintiff Huda Jasso has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1262. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Huda Jasso fled to Kurdistan with her husband, their two children, and her husband's parents. ISIS shot at Plaintiff Huda Jasso and her family while fleeing to Kurdistan. Plaintiff Huda Jasso's parents, cousins, and other family members fled separately to Kurdistan. ISIS killed two of Plaintiff Huda Jasso's cousins. In addition, five of Plaintiff Huda Jasso's young nieces and nephews died from a tent fire in a camp for internally displaced persons in Kurdistan.

1263. ISIS looted and destroyed Plaintiff Huda Jasso's real and personal property.

1264. As a result of ISIS's invasion, Plaintiffs Huda Jasso has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of her family's society and counsel.

**Majjo Khalaf and Gharib Kheder**

1265. Plaintiffs Majjo Khalaf and Gharib Kheder are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Majjo Khalaf and Plaintiff Gharib Kheder are married.

1266. Plaintiffs Majjo Khalaf and Gharib Kheder have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1267. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Majjo Khalaf's family, including his siblings, nieces, and nephews, fled to Sinjar Mountain. Plaintiff Gharib Kheder's sister and brothers fled to Kurdistan. Plaintiffs Majjo Khalaf and Gharib Kheder fearfully followed their families' journeys as they fled. ISIS captured one of Plaintiff Majjo Khalaf's brothers and one of his nieces with her family, and they are still missing. ISIS killed two of Plaintiff Majjo Khalaf's nephews and two of Plaintiff Gharib Kheder's nephews. ISIS shot Plaintiff Gharib Kheder's sister while she fled, causing her to lose her vision. Plaintiff Gharib Kheder now suffers from psychological problems and difficulty sleeping following the invasion.

1268. ISIS looted and destroyed Plaintiffs Majjo Khalaf and Gharib Kheder's real and personal property.

1269. As a result of ISIS's invasion, Plaintiffs Majjo Khalaf and Gharib Kheder have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Abas Alhami and Reema Alhamy**

1270. Plaintiffs Abas Alhami and Reema Alhamy are citizens of the United States and domiciled in the state of Illinois. Plaintiffs Abas Alhami and Reema Alhamy are married.



1271. Plaintiffs Abas Alhami and Reema Alhamy have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1272. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Abas Alhami's family, including his parents and siblings, and Plaintiff Reema Alhamy's grandmother fled to Kurdistan. Plaintiff Reema Alhamy's uncles also fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Abas Alhami and Reema Alhamy fearfully followed their families' journey as they fled. Plaintiff Reema Alhamy's grandmother and Plaintiff Abas Alhami's mother remain in camps for internally displaced persons in Kurdistan. As a result of ISIS's invasion, Plaintiff Reema Alhamy suffered from nightmares.

1273. ISIS looted and destroyed Plaintiffs Abas Alhami and Reema Alhamy's real and personal property.

1274. As a result of ISIS's invasion, Plaintiffs Abas Alhami and Reema Alhamy have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Abraham Qaso, Sheren Qaso, Valentina Qaso, Isaac Qaso, and Angel Qaso**

1275. Plaintiffs Abraham Qaso, Sheren Qaso, Valentina Qaso, Isaac Qaso, and Angel Qaso are citizens of the United States and domiciled in the state of Washington. Plaintiff Abraham Qaso and Plaintiff Sheren Qaso are married. Plaintiffs Valentina Qaso, Isaac Qaso, and Angel Qaso are their children.

1276. Plaintiffs Abraham Qaso, Sheren Qaso, Valentina Qaso, Isaac Qaso, and Angel Qaso have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1277. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Abraham Qaso, Sheren Qaso, Valentina Qaso, Isaac Qaso, and Angel Qaso's families fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Abraham Qaso's parents fled directly to Kurdistan. Plaintiffs Abraham Qaso, Sheren Qaso, Valentina Qaso, Isaac Qaso, and Angel Qaso fearfully followed their families' journeys as they fled. ISIS captured Plaintiff Abraham Qaso's maternal uncle with his wife and children. Plaintiff Abraham Qaso's uncle, uncle's wife, and all but one of their children are still missing. ISIS captured Plaintiff Sheren Qaso's uncle, his wife, and their children. Plaintiff Sheren Qaso's uncle's wife and some of their children are still missing.

1278. ISIS looted and destroyed Plaintiffs Abraham Qaso, Sheren Qaso, Valentina Qaso, Isaac Qaso, and Angel Qaso's real and personal property.

1279. As a result of ISIS's invasion, Plaintiffs Abraham Qaso, Sheren Qaso, Valentina Qaso, Isaac Qaso, and Angel Qaso have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Dawood Masto and Inam Omar**

1280. Plaintiff Dawood Masto and Inam Omar are citizens of the United States and domiciled in the state of Texas. Plaintiffs Dawood Masto and Inam Omar are married.

1281. Plaintiff Dawood Masto and Inam Omar have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1282. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Dawood Masto's parents and siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. ISIS captured Plaintiff Dawood Masto's cousin

and his cousin's son, both of whom are still missing. Plaintiff Inam Omar's family, including her mother, siblings, and their families fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Some of her family members fled directly to Kurdistan. Plaintiffs Dawood Masto and Inam Omar fearfully followed their family's journey as they fled. Plaintiff Inam Omar's mother's legs got infected during the escape and she had to undergo surgery and ongoing treatment for her legs. Due to the stress of the invasion, Plaintiff Inam Omar's mother's eyes were strained, and she had to undergo surgery and receives injections to treat both eyes. ISIS shot at one of Plaintiff Inam Omar's brother while he was trying to escape. ISIS captured Plaintiff Inam Omar's two female cousins and they are still missing. ISIS also captured Plaintiff Inam Omar's step-aunt and she is still missing. Due to the invasion, Plaintiff Inam Omar had to undergo counseling. She is also still suffering from insomnia. Her stomach suffered from all the medication she was taking.

1283. ISIS looted and destroyed Plaintiffs Dawood Masto and Inam Omar's real and personal property.

1284. As a result of ISIS's invasion, Plaintiff Dawood Masto and Inam Omar have experienced economic loss, severe mental anguish, extreme emotional pain and suffering, loss of property, and/or loss of their family's society and counsel.

**Faisal Saydo**

1285. Plaintiff Faisal Saydo is a citizen of the United States and domiciled in the state of Washington.

1286. Plaintiff Faisal Saydo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1287. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Faisal Saydo's family, including his mother, siblings, uncles, and cousins, fled to Kurdistan. Plaintiff Faisal Saydo fearfully followed his family's journey as they fled.

1288. ISIS looted and destroyed Plaintiff Faisal Saydo's real and personal property.

1289. As a result of ISIS's invasion, Plaintiff Faisal Saydo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Naji Majo**

1290. Plaintiff Naji Majo is a citizen of the United States and domiciled in the state of Nebraska.

1291. Plaintiff Naji Majo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1292. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Naji Majo's family, including his uncles and cousins, tried to flee Sinjar. Plaintiff Naji Majo fearfully followed his family's journey as they fled. ISIS captured and killed Plaintiff Naji Majo's grandfather. ISIS killed eleven of Plaintiff Naji Majo's other relatives. Plaintiff Naji Majo has experienced symptoms of post-traumatic stress disorder and depression following ISIS's invasion.

1293. ISIS looted and destroyed Plaintiff Naji Majo's real and personal property.

1294. As a result of ISIS's invasion, Plaintiff Naji Majo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Saman Ali**

1295. Plaintiff Saman Ali is a citizen of the United States and domiciled in the state of Virginia.

1296. Plaintiff Saman Ali has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1297. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saman Ali's family, including his father, step-mother, brothers, and sisters, fled to Kurdistan. Plaintiff Saman Ali fearfully followed his family's journey as they fled, as he was also caring for his newborn who was born on the day ISIS invaded Sinjar.

1298. ISIS looted and destroyed Plaintiff Saman Ali's father's real and personal property.

1299. As a result of ISIS's invasion, Plaintiff Saman Ali has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Murad Ismael and Mahabat Ali**

1300. Plaintiffs Murad Ismael and Mahabat Ali are citizens of the United States and domiciled in the state of Texas. Plaintiff Mahabat Ali is Plaintiff Murad Ismael's mother.

1301. Plaintiffs Murad Ismael and Mahabat Ali have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1302. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Murad Ismael and Mahabat Ali's relatives fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Murad Ismael and Mahabat Ali fearfully followed their family's journey as they fled. ISIS killed Plaintiff Mahabat Ali's nephew

(Plaintiff Murad Ismael's cousin). ISIS captured Plaintiff Mahabat Ali's sister and sister's children (Plaintiff Murad Ismael's aunt and cousins) and held them captive.

1303. ISIS looted and destroyed Plaintiffs Murad Ismael and Mahabat Ali's real and personal property.

1304. As a result of ISIS's invasion, Plaintiffs Murad Ismael and Mahabat Ali have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Kuliar Jumaah**

1305. Plaintiff Kuliar Jumaah is a citizen of the United States and domiciled in the state of Texas.

1306. Plaintiff Kuliar Jumaah has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1307. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Kuliar Jumaah fled to Kurdistan with her mother, siblings, and their families.

1308. ISIS looted and destroyed Plaintiff Kuliar Jumaah's real and personal property.

1309. As a result of ISIS's invasion, Plaintiff Kuliar Jumaah has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Khaleel Assaf, Khifshi Sulaiman, and Ayaz Hasan**

1310. Plaintiffs Khaleel Assaf, Khifshi Sulaiman, and Ayaz Hasan are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Khaleel Assaf and Khifshi Sulaiman are married, and Plaintiff Ayaz Hasan is their son.

1311. Plaintiffs Khaleel Assaf, Khifshi Sulaiman, and Ayaz Hasan have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1312. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khaleel Assaf, Khifshi Sulaiman, and Ayaz Hasan fled to Kurdistan with other members of their family. Plaintiff Khaleel Assaf's daughter has suffered lasting psychological harm following the invasion. Plaintiffs Khaleel Assaf and Khifshi Sulaiman now suffer from heart problems following the invasion.

1313. ISIS looted and destroyed Plaintiffs Khaleel Assaf, Khifshi Sulaiman, and Ayaz Hasan's real and personal property.

1314. As a result of ISIS's invasion, Plaintiffs Khaleel Assaf, Khifshi Sulaiman, and Ayaz Hasan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khaleel Sulaiman, Khalidah Hussein, Saman Khodida, Randa Khodida, Salwan Khodida, Saad Khodida, Stefan Khodida, and M.K.**

1315. Plaintiffs Khaleel Sulaiman, Khalidah Hussein, Saman Khodida, Randa Khodida, Salwan Khodida, Saad Khodida, Stefan Khodida, and M.K., are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khaleel Sulaiman and Khalidah Hussein are married. Plaintiffs Saman Khodida, Randa Khodida, Salwan Khodida, Saad Khodida, Stefan Khodida, and M.K. are their children.

1316. Plaintiffs Khaleel Sulaiman, Khalidah Hussein, Saman Khodida, Randa Khodida, Salwan Khodida, Saad Khodida, Stefan Khodida, and M.K. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1317. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khaleel Sulaiman, Khalidah Hussein, and their children (Plaintiffs Saman Khodida,

Randa Khodida, Salwan Khodida, Saad Khodida, Stefan Khodida and M.K) fled to Kurdistan. Plaintiff Khaleel Sulaiman's step-mother and siblings separately fled to Kurdistan. Plaintiff Khalidah Hussein's siblings fled to Turkey. Plaintiff Khalidah Hussein is currently has anxiety because of the invasion, and is taking medication and undergoing therapy.

1318. ISIS looted and destroyed Plaintiffs Khaleel Sulaiman, Khalidah Hussein, Saman Khodida, Randa Khodida, Salwan Khodida, Saad Khodida, Stefan Khodida, and M.K's real and personal property.

1319. As a result of ISIS's invasion, Plaintiffs Khaleel Sulaiman, Khalidah Hussein, Saman Khodida, Randa Khodida, Salwan Khodida, Saad Khodida, Stefan Khodida, and M.K have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Khudhur Ali**

1320. Plaintiff Khudhur Ali is a citizen of the United States and domiciled in the state of Nebraska.

1321. Plaintiff Khudhur Ali suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1322. In particular, on or about August 3, 2014, fearing the impending ISIS's invasion of Sinjar, Iraq, Plaintiff Khudhur Ali, who is a former interpreter and cultural advisor to the U.S. Army, fled briefly to Sinjar Mountain with his wife and children, and then to Kurdistan. His other family members, including his parents and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan.

1323. ISIS looted and destroyed Plaintiffs Khudhur Ali's real and personal property.



1324. As a result of ISIS's invasion, Plaintiffs Khudhur Ali has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Mayan Ali, Miyasar Kalo, and Dalia Kalo**

1325. Plaintiffs Mayan Ali, Miyasar Kalo, and Dalia Kalo are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Mayan Ali is Plaintiffs Miyasar Kalo and Dalia Kalo's mother.

1326. Plaintiffs Mayan Ali, Miyasar Kalo, and Dalia Kalo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1327. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Mayan Ali, Miyasar Kalo, and Dalia Kalo fled to Sinjar Mountain with their families, where they were trapped until they were able to escape to Kurdistan. ISIS shot at Plaintiffs Mayan Ali, Miyasar Kalo, and Dalia Kalo during their escape. ISIS captured two of Plaintiffs Miyasar Kalo and Dalia Kalo's cousins, one of whom was in captivity for nearly two years before she escaped.

1328. ISIS looted and destroyed Plaintiffs Mayan Ali, Miyasar Kalo, and Dalia Kalo's real and personal property.

1329. As a result of ISIS's invasion, Plaintiffs Mayan Ali, Miyasar Kalo, and Dalia Kalo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Nabilyoon Nawaf**

1330. Plaintiff Nabilyoon Nawaf is a citizen of the United States and domiciled in the state of Nebraska.

1331. Plaintiff Nabilyoon Nawaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1332. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nabilyoon Nawaf's sister and her family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Nabilyoon Nawaf fearfully followed his family's journey as they fled. ISIS captured Plaintiff Nabilyoon Nawaf's aunt, uncle, and their daughters, and they are still missing.

1333. ISIS looted and destroyed Plaintiff Nabilyoon Nawaf's real and personal property.

1334. As a result of ISIS's invasion, Plaintiff Nabilyoon Nawaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Shawqi Sulaiman, Zaizo Ali, and Humoom Darweesh**

1335. Plaintiffs Shawqi Sulaiman, Zaizo Ali, and Humoom Darweesh are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Shawqi Sulaiman and Plaintiff Zaizo Ali are married. Plaintiff Humoom Darweesh is their daughter.

1336. Plaintiffs Shawqi Sulaiman, Zaizo Ali, and Humoom Darweesh have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1337. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Shawqi Sulaiman, Zaizo Ali, and Humoom Darweesh fled to Kurdistan with Plaintiff Shawqi Sulaiman's parents and siblings.

1338. ISIS looted and destroyed Plaintiffs Shawqi Sulaiman, Zaizo Ali, and Humoom Darweesh's real and personal property.

1339. As a result of ISIS's invasion, Plaintiffs Shawqi Sulaiman, Zaizo Ali, and Humoom Darweesh have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Zirvan Alaode**

1340. Plaintiff Zirvan Alaode is a citizen of the United States and domiciled in the state of California.

1341. Plaintiff Zirvan Alaode has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1342. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Zirvan Alaode's family, including his parents and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Zirvan Alaode fearfully followed his family's journey as they fled. ISIS captured Plaintiff Zirvan Alaode's sister and brother for several months, but they later escaped.

1343. ISIS looted and destroyed Plaintiff Zirvan Alaode's real and personal property.

1344. As a result of ISIS's invasion, Plaintiff Zirvan Alaode has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Khairi Smoqy and Ghazal Smoqy**

1345. Plaintiffs Khairi Smoqy and Ghazal Smoqy are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khairi Smoqy and Plaintiff Ghazal Smoqy are married.

1346. Plaintiffs Khairi Smoqy and Ghazal Smoqy have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1347. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khairi Smoqy and Ghazal Smoqy fled to Kurdistan with Plaintiff Khairi Smoqy's brother and Plaintiff Ghazal Smoqy's parents, sister, and their families.

1348. ISIS looted and destroyed Plaintiffs Khairi Smoqy and Ghazal Smoqy's real and personal property.

1349. As a result of ISIS's invasion, Plaintiffs Khairi Smoqy and Ghazal Smoqy have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Hadji Kheder**

1350. Plaintiff Hadji Kheder is a citizen of the United States and domiciled in the state of Nebraska.

1351. Plaintiff Hadji Kheder has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1352. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hadji Kheder's family, including his sister and uncles, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hadji Kheder fearfully followed his family's journey as they fled. ISIS beheaded one of Plaintiff Hadji Kheder's cousins.

1353. ISIS looted and destroyed Plaintiff Hadji Kheder's real and personal property.

1354. As a result of ISIS's invasion, Plaintiff Hadji Kheder has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Klestan Alhasan**

1355. Plaintiff Klestan Alhasan is a citizen of the United States and domiciled in the state of Nebraska.

1356. Plaintiff Klestan Alhasan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1357. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Klestan Alhasan fled to Sinjar Mountain with her husband, son, brothers, and husband's parents, where they were trapped until they were able to escape to Kurdistan. On their way to Sinjar Mountain, ISIS stopped and surrounded Plaintiff Klestan Alhasan and her family at the Jedali checkpoint for two hours, but they were able to escape. At the checkpoint, ISIS killed seven members of Plaintiff Klestan Alhasan's husband's family. ISIS also killed Plaintiff Klestan Alhasan's brother-in-law and captured Plaintiff Klestan Alhasan's sister. Plaintiff Klestan Alhasan's sister later managed to escape ISIS captivity.

1358. ISIS looted and destroyed Plaintiff Klestan Alhasan's real and personal property.

1359. As a result of ISIS's invasion, Plaintiff Klestan Alhasan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Faisal Smoqi, Samia Smoqi, and S.S.**

1360. Plaintiffs Faisal Smoqi, Samia Smoqi, and S.S are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Samia Smoqi, and S.S., are the children of Plaintiff Faisal Smoqi. Plaintiff S.S. is a minor.

1361. Plaintiffs Faisal Smoqi, Samia Smoqi, and S.S, have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1362. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Faisal Smoqi, Samia Smoqi, and S.S fled to Sinjar Mountain with Plaintiff Faisal Smoqi's wife and their other children, where they were trapped until they were able to escape to Kurdistan. Plaintiff Faisal Smoqi suffers from high blood pressure since the invasion.

1363. ISIS looted and destroyed Plaintiffs Faisal Smoqi, Samia Smoqi, and S.S's real and personal property.

1364. As a result of ISIS's invasion, Plaintiffs Faisal Smoqi, Samia Smoqi, and S.S. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Sleman Smoqi**

1365. Plaintiff Sleman Smoqi is a citizen of the United States and domiciled in the state of Nebraska.

1366. Plaintiff Sleman Smoqi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1367. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sleman Smoqi fled to Sinjar Mountain with his parents and siblings. Plaintiff Sleman Smoqi lost his family and was trapped alone on the mountain for fifteen days. Once reunited with his family, they remained trapped on the mountain until they were able to escape to Kurdistan.

1368. ISIS looted and destroyed Plaintiff Sleman Smoqi's real and personal property.

1369. As a result of ISIS's invasion, Plaintiff Sleman Smoqi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Ozair Al Jndo and Jamila Al Jndo**

1370. Plaintiffs Ozair Al Jndo and Jamila Al Jndo are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Ozair Al Jndo and Jamila Al Jndo are married.

1371. Plaintiffs Ozair Al Jndo and Jamila Al Jndo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1372. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Ozair Al Jndo and Jamila Al Jndo fled to Sinjar Mountain with their children and Plaintiff Ozair Al Jndo's mother and brothers, where they were trapped until they were able to escape to Kurdistan. ISIS shot Plaintiff Ozair Al Jndo's brother in the hand as they were fleeing, and he was unable to treat the injury on Sinjar Mountain. Plaintiff Jamila Al Jndo's brother was briefly captured by ISIS and her mother became ill upon hearing of this, and is still sick. Plaintiff Jamila Al Jndo now suffers from several illnesses, including mental health issues for which she takes medication.

1373. ISIS looted and destroyed Plaintiffs Ozair al Jndo and Jamila al Jndo's real and personal property.

1374. As a result of ISIS's invasion, Plaintiffs Ozair al Jndo and Jamila al Jndo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and the loss of their family's society and counsel.

**Khalid Jendo**

1375. Plaintiff Khalid Jendo is a citizen of the United States and domiciled in the state of Nebraska.

1376. Plaintiff Khalid Jendo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1377. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khalid Jendo fled to Sinjar Mountain with his wife, son, uncle, and uncle's family, where they were trapped until they were able to escape to Kurdistan.

1378. ISIS looted and destroyed Plaintiff Khalid Jendo's real and personal property.

1379. As a result of ISIS's invasion, Plaintiff Khalid Jendo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Husein Hesso and Riyad Hesso**

1380. Plaintiffs Husein Hesso and Riyad Hesso are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Husein Hesso and Riyad Hesso are siblings.

1381. Plaintiffs Husein Hesso and Riyad Hesso have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1382. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Husein Hesso and Riyad Hesso's family, including their brother and sister, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Husein Hesso and Riyad Hesso fearfully followed his family's journey as they fled. Plaintiff Riyad Hesso suffers from anxiety and panic attacks due to the invasion.

1383. ISIS looted and destroyed Plaintiffs Husein Hesso and Riyad Hesso's real and personal property.

1384. As a result of ISIS's invasion, Plaintiffs Husein Hesso and Riyad Hesso have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Sabah Qasim**



1385. Plaintiff Sabah Qasim is a citizen of the United States and domiciled in the state of Nebraska.

1386. Plaintiff Sabah Qasim has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1387. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sabah Qasim's parents, siblings, and one brother's family fled to Kurdistan. Plaintiff Sabah Qasim fearfully followed his family's journey as they fled. ISIS killed Plaintiff Sabah Qasim's aunt and cousins.

1388. ISIS looted and destroyed Plaintiff Sabah Qasim's real and personal property.

1389. As a result of ISIS's invasion, Plaintiff Sabah Qasim has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Sameer Zandinan**

1390. Plaintiff Sameer Zandinan is a citizen of the United States and domiciled in the state of Nebraska.

1391. Plaintiff Sameer Zandinan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1392. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sameer Zandinan fled to Sinjar Mountain with his family, where he was trapped until he was able to escape to Kurdistan. Plaintiff Sameer Zandinan witnessed ISIS killing people as he fled. While fleeing to Sinjar Mountain, Plaintiff Sameer Zandinan and his family were also stopped by ISIS and trapped in a village near the mountain for several days. ISIS stole Plaintiff Sameer Zandinan's personal belongings. He and his family were able to escape when their ISIS

captors left the village. ISIS killed Plaintiff Sameer Zandinan's grandfather and captured Plaintiff Sameer Zandinan's niece. She is still missing. Since the invasion, Plaintiff Sameer Zandinan suffers from post-traumatic stress disorder and depression.

1393. ISIS looted and destroyed Plaintiff Sameer Zandinan's real and personal property.

1394. As a result of ISIS's invasion, Plaintiff Sameer Zandinan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Naif Alsilo and Fawziya Hami**

1395. Plaintiffs Naif Alsilo and Fawziya Hami are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Naif Alsilo and Plaintiff Fawziya Hami are married.

1396. Plaintiffs Naif Alsilo and Fawziya Hami have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1397. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Naif Alsilo and Fawziya Hami fled to Kurdistan with their children and siblings. ISIS killed Plaintiff Fawziya Hami's brother. Plaintiff Fawziya Hami's father died upon hearing of his son's death. ISIS also killed Plaintiff Fawziya Hami's cousin.

1398. ISIS looted and destroyed Plaintiffs Naif Alsilo and Fawziya Hami's real and personal property.

1399. As a result of ISIS's invasion, Plaintiffs Naif Alsilo and Fawziya Hami have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Mohsin Alsalo and Ahlam Albobo**

1400. Plaintiffs Mohsin Alsalo and Ahlam Albobo are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Mohsin Alsalo and Ahlam Albobo are married.

1401. Plaintiffs Mohsin Alsalo and Ahlam Albobo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1402. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Mohsin Alsalo's family, including his brother and sisters, and Plaintiff Ahlam Albobo's family, including her father, sister, and uncle, fled to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan. Plaintiffs Mohsin Alsalo and Ahlam Albobo fearfully followed their families' journeys as they fled. ISIS killed two of Plaintiff Mohsin Alsalo's cousins and captured his niece, though she was later able to escape. As a result of the invasion, Plaintiff Mohsin Alsalo stopped his nursing studies.

1403. ISIS looted and destroyed Plaintiffs Mohsin Alsalo and Ahlam Albobo's real and personal property.

1404. As a result of ISIS's invasion, Plaintiffs Mohsin Alsalo and Ahlam Albobo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Haji Hameka and Shami Ibraheem**

1405. Plaintiffs Haji Hameka and Shami Ibraheem are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Haji Hameka and Shami Ibraheem are married.

1406. Plaintiff Haji Hameka and Shami Ibraheem have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1407. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Haji Hameka and Shami Ibraheem's family, including Plaintiff Haji Hameka's step-

mother, brother, and his family fled to Kurdistan. Plaintiffs Haji Hameka and Shami Ibraheem fearfully followed their family's journey as they fled. Plaintiff Haji Hameka supported his family until they were able to escape to Germany. Due to the invasion, Plaintiff Shami Ibraheem suffers from depression and undergoes therapy and had to take medication. Plaintiff Haji Hameka also suffers from trauma following the invasion.

1408. ISIS looted and destroyed Plaintiffs Haji Hameka and Shami Ibraheem's real and personal property.

1409. As a result of ISIS's invasion, Plaintiffs Haji Hameka and Shami Ibraheem have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Izdeen Smoqy, Khalida Simoqi, and Khifshi Hassan**

1410. Plaintiffs Izdeen Smoqy, Khalida Simoqi, and Khifshi Hassan are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Izdeen Smoqy and Khalida Simoqi are siblings, and Plaintiff Khifshi Hassan is their mother.

1411. Plaintiff Izdeen Smoqy, Khalida Simoqi, and Khifshi Hassan have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1412. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Izdeen Smoqy, Khalida Simoqi, and Khifshi Hassan fled to Kurdistan with Plaintiff Khifshi Hassan's husband and children (Plaintiffs Izdeen Smoqy and Khalida Simoqi's father and siblings) and their families. Plaintiff Khalida Simoqi is still suffering from emotional trauma due to the invasion. Plaintiff Khifshi Hassan also suffers from anxiety and depression triggered by the invasion.

1413. ISIS looted and destroyed Plaintiffs Izdeen Smoqy, Khalida Simoqi, and Khifshi Hassan's real and personal property.

1414. As a result of ISIS's invasion, Plaintiffs Izdeen Smoqy, Khalida Simoqi, and Khifshi Hassan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ahmed Omar**

1415. Plaintiff Ahmed Omar is a citizen of the United States and domiciled in the state of Nebraska.

1416. Plaintiff Ahmed Omar has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1417. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ahmed Omar fled to Sinjar Mountain with his wife, daughter, mother, and siblings, where they were trapped until they were able to escape to Kurdistan.

1418. ISIS looted and destroyed Plaintiff Ahmed Omar's real and personal property.

1419. As a result of ISIS's invasion, Plaintiff Ahmed Omar has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Khairi Alpishimam, Khokhi Alpishimam, and Falah Alpishimam**

1420. Plaintiffs Khairi Alpishimam, Khokhi Alpishimam, and Falah Alpishimam are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Khairi Alpishimam and Khokhi Alpishimam are married. Plaintiffs Khairi Alpishimam and Falah Alpishimam are brothers.

1421. Plaintiffs Khairi Alpishimam, Khokhi Alpishimam, and Falah Alpishimam have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1422. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khairi Alpishimam, Khokhi Alpishimam, and Falah Alpishimam fled to Sinjar Mountain with Plaintiffs Khairi Alpishimam and Falah Alpishimam's parents and siblings and Plaintiffs Khairi Alpishimam and Khokhi Alpishimam's children, where they were trapped until they were able to escape to Kurdistan. Plaintiff Falah Alpishimam injured his ankle while fleeing and still suffers from the pain of this injury.

1423. ISIS looted and destroyed Plaintiffs Khairi Alpishimam, Khokhi Alpishimam, and Falah Alpishimam's real and personal property.

1424. As a result of ISIS's invasion, Plaintiffs Khairi Alpishimam, Khokhi Alpishimam, and Falah Alpishimam have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Azeer Ismael and Sozan Khalaf**

1425. Plaintiffs Azeer Ismael and Sozan Khalaf are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Azeer Ismael and Sozan Khalaf are married.

1426. Plaintiffs Azeer Ismael and Sozan Khalaf have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidi's in Iraq.

1427. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Azeer Ismael's family, including his parents and siblings, and Plaintiff Sozan Khalaf's family, including her mother and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Azeer Ismael and Sozan Khalaf

fearfully followed their families' journey as they fled. Plaintiff Sozan Khalaf was pregnant at the time of the invasion and gave birth upon reaching Kurdistan.

1428. ISIS looted and destroyed Plaintiffs Azeer Ismael and Sozan Khalaf's real and personal property.

1429. As a result of ISIS's invasion, Plaintiffs Azeer Ismael and Sozan Khalaf have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Diksa Alkhalaf, Lina Khider, Faysal Khudir, and Samia Ahmed**

1430. Plaintiffs Diksa Alkhalaf, Lina Khider, Faysal Khudir, and Samia Ahmed are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Lina Khider and Plaintiff Faysal Khudir are siblings, and Plaintiff Diksa Alkhalaf is their mother. Plaintiff Faysal Khudir and Samia Ahmed are married.

1431. Plaintiffs Diksa Alkhalaf, Lina Khider, Faysal Khudir, and Samia Ahmed have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1432. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Diksa Alkhalaf, Lina Khider, Faysal Khudir, and Samia Ahmed fled to Kurdistan with Plaintiff Diksa Alkhalaf's husband and children (Plaintiffs Lina Khider and Faysal Khudir's father and siblings). Plaintiff Samia Ahmed's family separately fled to Kurdistan. Plaintiff Diksa Alkhalaf's husband (Plaintiffs Lina Khider and Faysal Khudir's father) died of a heart attack in Kurdistan. Plaintiffs Lina Khider and Faysal Khudir's stepbrother and his family died while fleeing to Europe. Another stepbrother's entire family, except for himself and a daughter, also died while fleeing to Europe.

1433. ISIS looted and destroyed Diksa Alkhalaf, Lina Khider, Faysal Khudir, and Samia Ahmed's real and personal property.

1434. As a result of ISIS's invasion, Plaintiffs Diksa Alkhalaf, Lina Khider, Faysal Khudir, and Samia Ahmed have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ziyad Khudir**

1435. Plaintiff Ziyad Khudir is a citizen of the United States and domiciled in the state of Nebraska.

1436. Plaintiff Ziyad Khudir has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1437. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ziyad Khudir's family, including his siblings and their families fled to Sinjar Mountain, where they were trapped until they were able to escape first to Kurdistan, and then to Turkey. Plaintiff Ziyad Khudir fearfully followed his family's journey as they fled. Plaintiff Ziyad Khudir's mother and other siblings also fled to Kurdistan.

1438. ISIS looted and destroyed Ziyad Khudir's real and personal property.

1439. As a result of ISIS's invasion, Plaintiff Ziyad Khudir has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Aede Aldukhi**

1440. Plaintiff Aede Aldukhi is a citizen of the United States and domiciled in the state of Nebraska.



1441. Plaintiff Aede Aldukhi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1442. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Aede Aldukhi's family, including her mother and siblings, fled to Kurdistan. Plaintiff Aede Aldukhi fearfully followed her family's journey as they fled. ISIS killed two of Plaintiff Aede Aldukhi's cousins. Plaintiff Aede Aldukhi's sister lost five children when their tent burned down in a temporary camp. Plaintiff Aede Aldukhi's sister later died of stomach cancer.

1443. ISIS looted and destroyed Plaintiff Aede Aldukhi's real and personal property.

1444. As a result of ISIS's invasion, Plaintiff Aede Aldukhi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Faris Khether**

1445. Plaintiff Faris Khether is a citizen of the United States and domiciled in the state of Nebraska.

1446. Plaintiff Faris Khether has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1447. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Faris Khether's family, including his parents and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Faris Khether fearfully followed his family's journey as they fled. Plaintiff Faris Khether's father died from a heart attack shortly thereafter. Plaintiff Faris Khether's mother suffered from a series of strokes following the invasion.

1448. ISIS looted and destroyed Plaintiff Faris Khether's real and personal property.

1449. As a result of ISIS's invasion, Plaintiff Faris Khether has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Asia Ezeden**

1450. Plaintiff Asia Ezeden is a citizen of the United States and domiciled in the state of Nebraska.

1451. Plaintiff Asia Ezeden has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1452. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Asia Ezeden's parents and siblings fled their homes towards Sinjar Mountain. However, her parents, some of her brothers, and their families were captured by ISIS while they were fleeing and were held for over a month. ISIS abused and starved Plaintiff Asia Ezeden's parents, her brothers, and their families while in captivity, and physically beat one of Plaintiff Asia Ezeden's brothers. When they finally managed to escape, they fled to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan. Other members of Plaintiff Asia Ezeden's family, including her brother and sister and their families, fled directly to Kurdistan. Plaintiff Asia Ezeden fearfully followed her familys journey as they fled.

1453. ISIS looted and destroyed Plaintiff Asia Ezeden's real and personal property.

1454. As a result of ISIS's invasion, Plaintiff Asia Ezeden has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Sharo Smogy**

1455. Plaintiff Sharo Smoqy is a citizen of the United States and domiciled in the state of Nebraska.

1456. Plaintiff Sharo Smoqy has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1457. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sharo Smoqy's family, including his siblings, step-mother, and their families, fled to Kurdistan. Plaintiff Sharo Smoqy fearfully followed his family's journey as they fled. One of Plaintiff Sharo Smoqy's sisters was particularly traumatized after fleeing ISIS and became unable to care for her children while living in internally displaced camps in Kurdistan. Plaintiff Sharo Smoqy's uncle was disabled and was left behind in the village and is presumed dead.

1458. ISIS looted and destroyed Plaintiff Sharo Smoqy's real and personal property.

1459. As a result of ISIS's invasion, Plaintiff Sharo Smoqy has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Murad Smoqy**

1460. Plaintiff Murad Smoqy is a citizen of the United States and domiciled in the state of Nebraska.

1461. Plaintiff Murad Smoqy has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1462. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Murad Smoqy's family, including his stepmother, siblings, and their families, fled to Kurdistan. Plaintiff Murad Smoqy fearfully followed his family's journey as they fled. ISIS killed Plaintiff Murad Smoqy's brother-in-law.

1463. ISIS looted and destroyed Murad Smoqy's real and personal property.

1464. As a result of ISIS's invasion, Plaintiff Murad Smoqy has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Sameer Darweesh and Nora Yazdeen**

1465. Plaintiffs Sameer Darweesh and Nora Yazdeen are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Sameer Darweesh and Nora Yazdeen are married.

1466. Plaintiffs Sameer Darweesh and Nora Yazdeen have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1467. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sameer Darweesh fled to Sinjar Mountain with his parents and siblings, where they were trapped until they were able to escape to Kurdistan. Plaintiff Nora Yazdeen similarly fled to Sinjar Mountain with her parents, step-mother, and siblings, where they were trapped until they were able to escape to Kurdistan. ISIS captured Plaintiff Sameer Darweesh aunt, and some of his cousins, but they later managed to escape. Plaintiff Nora Yazdeen's cousin was in ISIS captivity for a year, until she was able to escape.

1468. ISIS looted and destroyed Plaintiffs Sameer Darweesh and Nora Yazdeen's real and personal property.

1469. As a result of ISIS's invasion, Plaintiffs Sameer Darweesh and Nora Yazdeen have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Shihab Hami, Suad Khalaf, G.A., W.A., J.A., Wa. A., and A.A.**

1470. Plaintiffs Shihab Hami, Suad Khalaf, G.A., W.A., J.A., Wa. A., and A.A. are citizens of the United States and domiciled in the state of California. Plaintiff Shihab Hami and Plaintiff Suad Khalaf are married. Plaintiffs G.A., W.A., J.A., Wa. A., and A.A. are Plaintiffs Shihab Hami and Suad Khalaf's children.

1471. Plaintiffs Shihab Hami, Suad Khalaf, G.A., W.A., J.A., Wa. A., and A.A. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1472. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Shihab Hami's family, including his parents, stepmother, siblings, and step-siblings, and Plaintiff Suad Khalaf's, family, including her mother and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Shihab Hami, Suad Khalaf, G.A., W.A., J.A., Wa. A., and A.A. fearfully followed their families' journeys as they fled. ISIS captured Plaintiff Suad Khalaf's brother and killed Plaintiff Shihab Hami's close relatives. Plaintiff Shihab Hami's father later suffered a stroke. Plaintiffs Shihab Hami and Suad Khalaf have gone to psychiatric treatment numerous times following the invasion.

1473. ISIS looted and destroyed Plaintiffs Shihab Hami, Suad Khalaf, G.A., W.A., J.A., Wa. A., and A.A.'s real and personal property.

1474. As a result of ISIS's invasion, Plaintiffs Shihab Hami, Suad Khalaf, G.A., W.A., J.A., Wa. A., and A.A. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ali Turki**

1475. Plaintiff Ali Turki is a citizen of the United States and domiciled in the state of Nebraska.

1476. Plaintiff Ali Turki has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1477. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ali Turki's family, including his mother and siblings, fled to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan. Plaintiff Ali Turki fearfully followed his family's journey as they fled.

1478. ISIS looted and destroyed Plaintiff Ali Turki's real and personal property.

1479. As a result of ISIS's invasion, Plaintiff Ali Turki has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Naeemah Nimr**

1480. Plaintiff Naeemah Nimr is a citizen of the United States and domiciled in the state of Nebraska.

1481. Plaintiff Naeemah Nimr has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1482. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Naeemah Nimr fled to Sinjar Mountain with her parents-in law, where they were trapped until they were able to escape to Kurdistan. Plaintiff Naeemah Nimr's parents and siblings fled separately to Sinjar Mountain, where they were also trapped until they were able to escape to Kurdistan. ISIS captured Plaintiff Naeemah Nimr's uncle who remains missing to this day. Since the invasion, Plaintiff Naeemah Nimr suffers from mental and physical health issues, including loss of consciousness, nightmares, and insomnia.

1483. ISIS looted and destroyed Plaintiff Naeemah Nimr's real and personal property.

1484. As a result of ISIS's invasion, Plaintiff Naeemah Nimr has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Farooq Ibrahim and Nadia Ibrahim**

1485. Plaintiffs Farooq Ibrahim and Nadia Ibrahim are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Farooq Ibrahim and Nadia Ibrahim are married.

1486. Plaintiffs Farooq Ibrahim and Nadia Ibrahim have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1487. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Farooq Ibrahim and Nadia Ibrahim fled to Sinjar Mountain with their children and Plaintiff Farooq Ibrahim's father, siblings, and their families, where they were trapped until they were able to escape to Kurdistan and then to Turkey. While fleeing to the mountain, Plaintiffs Farooq Ibrahim, Nadia Ibrahim, and their family were trapped in a village for around nine days. Plaintiff Farooq Ibrahim's father lost the ability to walk and talk following the invasion, and subsequently died.

1488. ISIS looted and destroyed Plaintiffs Farooq Ibrahim and Nadia Ibrahim's real and personal property.

1489. As a result of ISIS's invasion, Plaintiffs Farooq Ibrahim and Nadia Ibrahim have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Saeed Bakr**

1490. Plaintiff Saeed Bakr is a citizen of the United States and domiciled in the state of Nebraska.

1491. Plaintiff Saeed Bakr has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1492. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saeed Bakr's family, including his wife, children, mother, brothers, and their families, fled to Sinjar Mountain. They first attempted to flee to Kurdistan, but ISIS captured them. They escaped captivity and returned to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Saeed Bakr fearfully followed his family's journey as they fled. Plaintiff Saeed Bakr's wife now suffers from severe depression following the invasion.

1493. ISIS looted and destroyed Plaintiff Saeed Bakr's real and personal property.

1494. As a result of ISIS's invasion, Plaintiff Saeed Bakr has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Azeez Haskan and Aliefa Rasho**

1495. Plaintiffs Azeez Haskan and Aliefa Rasho are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Azeez Haskan and Aliefa Rasho are married.

1496. Plaintiffs Azeez Haskan and Aliefa Rasho have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1497. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Azeez Haskan and Aliefa Rasho fled to Kurdistan along with other members of Plaintiff Azeez Haskan's family. Plaintiff Aliefa Rasho was pregnant at the time, and later gave birth in a camp for internally displaced persons in Kurdistan. Plaintiff Aliefa Rasho suffers from poor mental health since the invasion.



1498. ISIS looted and destroyed Plaintiffs Azeez Haskan and Aliefa Rasho's real and personal property.

1499. As a result of ISIS's invasion, Plaintiffs Azeez Haskan and Aliefa Rasho have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property, and/or loss of their family's society and counsel.

**Nissani Jndo, Talal Rasho, Jamal Rasho, Pasha Rasho, Abeer Kareem, Am.K., R.ohK., Si.K., Jalal Rasho, Base Awsman, Ra.K., Rae.K., and Sa.K.**

1500. Plaintiffs Nissani Jndo, Talal Rasho, Jamal Rasho, Pasha Rasho, Abeer Kareem, Am.K., Roh.K., Si.K., Jalal Rasho, Base Awsman, Ra.K., Rae.K., and Sa.K. are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Talal Rasho, Jamal Rasho, Pasha Rasho, and Jalal Rasho are the sons of Plaintiff Nissani Jndo. Plaintiff Jalal Rasho and Plaintiff Base Awsman are married and Ra.K., Rae.K., and Sa.K. are their children. Plaintiff Pasha Rasho and Plaintiff Abeer Kareem are married, and Am.K., Roh.K., and Si.K. are their children.

1501. Plaintiffs Nissani Jndo, Talal Rasho, Jamal Rasho, Pasha Rasho, Abeer Kareem, Am.K., Roh.K., Si.K., Jalal Rasho, Base Awsman, Ra.K., Rae.K., and Sa.K. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1502. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Nissani Jndo, Jamal Rasho, Pasha Rasho, Abeer Kareem, Am.K., Roh.K., Si.K., Jalal Rasho, Base Awsman, Ra.K., Rae.K., and Sa.K. fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Nissani Jndo's mother was left behind, and her whereabouts are still unknown. Plaintiff Talal Rasho fearfully followed his family's journey as they fled. Plaintiff Nissani Jndo's nephew (Plaintiffs Talal Rasho, Jamal Rasho, Pasha Rasho, and Jalal Rasho's cousin) died while living in a camp for internally displaced persons.

Plaintiff Base Awsman's sister was captured by ISIS with her children. She was sold as a slave multiple times until she managed to escape with her children.

1503. ISIS looted and destroyed Plaintiffs Nissani Jndo, Talal Rasho, Jamal Rasho, Pasha Rasho, Abeer Kareem, Am.K., Roh.K., Si.K., Jalal Rasho, Base Awsman, Ra.K., Rae.K., and Sa.K.'s real and personal property.

1504. As a result of ISIS's invasion, Plaintiffs Nissani Jndo, Talal Rasho, Jamal Rasho, Pasha Rasho, Abeer Kareem, Am.K., Roh.K., Si.K., Jalal Rasho, Base Awsman, Ra.K., Rae.K., and Sa.K. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Naam Simoqy, Nayif Ibrahim, Murad Qasim, and Asaad Qasim**

1505. Plaintiffs Naam Simoqy, Nayif Ibrahim, Murad Qasim, and Asaad Qasim are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Naam Simoqy and Plaintiff Nayif Ibrahim are married, and Plaintiffs Murad Qasim, and Asaad Qasim are their children.

1506. Plaintiffs Naam Simoqy, Nayif Ibrahim, Murad Qasim, and Asaad Qasim have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1507. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Naam Simoqy, Nayif Ibrahim, Murad Qasim, and Asaad Qasim fled to Kurdistan.

1508. ISIS looted and destroyed Plaintiffs Naam Simoqy, Nayif Ibrahim, Murad Qasim, and Asaad Qasim's real and personal property.

1509. As a result of ISIS's invasion, Plaintiffs Naam Simoqy, Nayif Ibrahim, Murad Qasim, and Asaad Qasim have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Nawfee Khadeeda**

1510. Plaintiff Nawfee Khadeeda is a citizen of the United States and domiciled in the state of Nebraska.

1511. Plaintiff Nawfee Khadeeda has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1512. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nawfee Khadeeda's family, including her daughter and son-in-law, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Nawfee Khadeeda fearfully followed her family's journey as they fled. ISIS killed Plaintiff Nawfee Khadeeda's uncle and aunt and captured her cousin, who died in captivity. ISIS blinded Plaintiff Nawfee Khadeeda's nephew and captured his family. Plaintiff Nawfee Khadeeda's nephew was eventually released but his wife is still missing. Plaintiff Nawfee Khadeeda now suffers from psychological problems following the invasion and is being treated for depression and anxiety.

1513. ISIS looted and destroyed Plaintiff Nawfee Khadeeda's real and personal property.

1514. As a result of ISIS's invasion, Plaintiff Nawfee Khadeeda has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Kiret Haji**

1515. Plaintiff Kiret Haji is a citizen of the United States and domiciled in the state of Nebraska.

1516. Plaintiff Kiret Haji has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1517. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Kiret Haji fled to Kurdistan with his children, grandchildren, and their families.

1518. ISIS looted and destroyed Plaintiff Kiret Haji's real and personal property.

1519. As a result of ISIS's invasion, Kiret Haji has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Guli Mahko, Eedo Khalaf, Barakat Mahko, and Turkia Mahko**

1520. Plaintiffs Guli Mahko, Eedo Khalaf, Barakat Mahko, and Turkia Mahko are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Guli Mahko and Plaintiff Eedo Khalaf are married. Plaintiff Guli Mahko and Plaintiff Turkia Mahko are Plaintiff Barakat Mahko's sisters.

1521. Plaintiffs Guli Mahko, Eedo Khalaf, Barakat Mahko, and Turkia Mahko have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1522. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Guli Mahko, Plaintiff Eedo Khalaf, Barakat Mahko, and Turkia Mahko fled to Sinjar Mountain with Plaintiff Eedo Khalaf's family members, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Guli Mahko, Barakat Mahko, and Turkia Mahko's brother died while living in a camp for internally displaced persons in Kurdistan.

1523. ISIS looted and destroyed Plaintiffs Guli Mahko, Eedo Khalaf, Barakat Mahko, and Turkia Mahko's real and personal property.

1524. As a result of ISIS's invasion, Plaintiffs Guli Mahko, Eedo Khalaf, Barakat Mahko, and Turkia Mahko have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Kochar Mhko and Kamiran Choko**

1525. Plaintiffs Kochar Mhko and Kamiran Choko are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Kochar Mhko is Plaintiff Kamiran Choko's mother.

1526. Plaintiffs Kochar Mhko and Kamiran Choko have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1527. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Kochar Mhko and Kamiran Choko fled to Kurdistan with Plaintiff Kochar Mhko's husband, and Plaintiff Kochar Mhko's other children. Plaintiffs Kochar Mhko and Kamiran Choko and their family fled on foot. Plaintiff Kochar Mhko was pregnant and suffered a miscarriage. Plaintiff Kochar Mhko's son died in the camps for internally displaced persons. Plaintiffs Kochar Mhko and Kamiran Choko now suffer from, and Plaintiff Kochar Mhko is medicated for, post-traumatic stress disorder following the invasion.

1528. ISIS looted and destroyed Plaintiffs Kochar Mhko and Kamiran Choko's real and personal property.

1529. As a result of ISIS's invasion, Plaintiffs Kochar Mhko and Kamiran Choko have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Basim Khalaf**

1530. Plaintiff Basim Khalaf is a citizen of the United States and domiciled in the state of Nebraska.

1531. Plaintiff Basim Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1532. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Basim Khalaf fled to Kurdistan with his parents and siblings.

1533. ISIS looted and destroyed Plaintiff Basim Khalaf's real and personal property.

1534. As a result of ISIS's invasion, Plaintiff Basim Khalaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Omar Rashsho**

1535. Plaintiff Omar Rashsho is a citizen of the United States and domiciled in the state of Nebraska.

1536. Plaintiff Omar Rashsho has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1537. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Omar Rashsho's family, including his siblings and cousins, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Omar Rashsho fearfully followed his family's journey as they fled. Plaintiff Omar Rashsho now suffers from diabetes, depression, anxiety, and stress following the invasion. As a result of his condition, Plaintiff Omar Rashsho is unable to continue employment.

1538. As a result of ISIS's invasion, Plaintiff Omar Rashsho has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Amal Kheder**

1539. Plaintiff Amal Kheder is a citizen of the United States and domiciled in the state of Nebraska.

1540. Plaintiff Amal Kheder has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1541. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Amal Kheder fled to Sinjar Mountain with her husband, children, and brother-in-

law, where they were trapped until they were able to escape to Kurdistan. Plaintiff Amal Kheder's father died in a camp for internally displaced persons in Kurdistan shortly thereafter. Plaintiff Amal Kheder's other family members, including her brothers and their children, fled to Turkey and then to Greece. Plaintiff Amal Kheder's two brothers died on the way to Greece.

1542. ISIS looted and destroyed Plaintiff Amal Kheder's real and personal property.

1543. As a result of ISIS's invasion, Plaintiff Amal Kheder has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Murad Qizly and Misry Adi**

1544. Plaintiffs Murad Qizly and Misry Adi are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Murad Qizly and Mizry Adi are married.

1545. Plaintiffs Murad Qizly and Misry Adi have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1546. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Murad Qizly and Misry Adi's family, including Plaintiff Misry Adi's parents and siblings, fled Sinjar. Plaintiffs Murad Qizly's parents and siblings had fled a month before the invasion for fear of the impending attacks. Plaintiffs Murad Qizly and Misry Adi had also fled Sinjar after receiving threats. Some of Plaintiffs Murad Qizly and Misry Adi's family members fled directly to Kurdistan. Others fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Murad Qizly and Misry Adi fearfully followed their family's journey as they fled. Plaintiff Murad Qizly's cousin's leg was injured during the escape. After the invasion, Plaintiff Misry Adi's brother attempted suicide and her sister-in-law died by suicide. Plaintiff Misry Adi's cousin had a heart attack the day that ISIS invaded.

1547. ISIS looted and destroyed Plaintiffs Murad Qizly and Misry Adi's real and personal property.

1548. As a result of ISIS's invasion, Plaintiffs Murad Qizly and Misry Adi have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Taalo Khudhur, Basee Naser, Fadi Pirali, Feryal Pirali, and A.P.**

1549. Plaintiffs Taalo Khudhur, Basee Naser, Fadi Pirali, Feryal Pirali, and A.P. are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Taalo Khudhur and Plaintiff Basee Naser are married. Plaintiffs Fadi Pirali, Feryal Pirali, and A.P. are their children.

1550. Plaintiffs Taalo Khudhur, Basee Naser, Fadi Pirali, Feryal Pirali, and A.P. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1551. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Taalo Khudhur's family, including his brother and brother's family, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Taalo Khudhur, Basee Naser, Fadi Pirali, Feryal Pirali, and A.P. fearfully followed their family's journey as they fled. Plaintiffs Taalo Khudhur and Basee Naser now suffer from depression following the invasion, requiring medication and psychotherapy. Plaintiff Feryal Pirali had to interrupt her education and could not finish her college degree, and she continues to suffer from mental health issues since the invasion which required therapy.

1552. ISIS looted and destroyed Plaintiffs Taalo Khudhur, Basee Naser, Fadi Pirali, Feryal Pirali, and A.P.'s real and personal property.

1553. As a result of ISIS's invasion, Plaintiffs Taalo Khudhur, Basee Naser, Fadi Pirali, Feryal Pirali, and A.P. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.



**Hadi Pir and Adula Mato**

1554. Plaintiffs Hadi Pir and Adula Mato are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Hadi Pir and Plaintiff Adula Mato are married.

1555. Plaintiffs Hadi Pir and Adula Mato have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1556. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Hadi Pir and Adula Mato's families fled Sinjar. Some family members fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Others fled directly to Kurdistan. Plaintiffs Hadi Pir and Adula Mato fearfully followed their families' journeys as they fled. Plaintiff Adula Mato's sister-in-law was pregnant at the time of the escape, and her baby was born prematurely. Plaintiff Adula Mato's cousin's son has been missing since the invasion. Plaintiff Adula Mato suffered post-partum depression due to the stress from the invasion.

1557. ISIS looted and destroyed Plaintiffs Hadi Pir and Adula Mato's real and personal property.

1558. As a result of ISIS's invasion, Plaintiffs Hadi Pir and Adula Mato have experienced economic loss; severe mental anguish; extreme emotional pain and suffering loss of property; and/or loss of their family's society and counsel.

**Khairi Elias, Maysoon Borali, and Hanan Jundi**

1559. Plaintiffs Khairi Elias, Maysoon Borali, and Hanan Jundi are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Khairi Elias and Maysoon Borali are married. Plaintiff Hanan Jundi is their daughter.

1560. Plaintiffs Khairi Elias, Maysoon Borali, and Hanan Jundi have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1561. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khairi Elias's family, including his mother, siblings, and nephews, and Plaintiff Maysoon Borali's family, including her uncles and their families, fled to Syria and then to Kurdistan. Plaintiff Maysoon Borali's family first fled to Sinjar Mountain until they were able to escape to Kurdistan. Plaintiffs Khairi Elias, Maysoon Borali, and Hanan Jundi fearfully followed their families' journeys as they fled. Plaintiff Khairi Elias's sister now suffers from nightmares and Plaintiff Maysoon Borali's cousins now suffer from mental health issues following the invasion. Plaintiffs Khairi Elias, Maysoon Borali, and Hanan Jundi continue to suffer from mental health conditions following the invasion.

1562. ISIS looted and destroyed Plaintiffs Khairi Elias, Maysoon Borali, and Hanan Jundi's real and personal property.

1563. As a result of ISIS's invasion, Plaintiffs Khairi Elias, Maysoon Borali, and Hanan Jundi have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Qasim Pir, Zaeeton Haji, and Hadeel Pirali**

1564. Plaintiffs Qasim Pir, Zaeeton Haji, and Hadeel Pirali are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Qasim Pir and Zaeeton Haji are married. Plaintiff Hadeel Pirali is their daughter.

1565. Plaintiffs Qasim Pir, Zaeeton Haji, and Hadeel Pirali have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1566. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Qasim Pir's family, including his cousins and uncles and Plaintiff Zaeeton Haji's parents, siblings, and their families fled Sinjar. Plaintiff Zaeeton Haji's family fled to Sinjar

Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Qasim Pir, Zaeeton Haji, and Hadeel Pirali fearfully followed their families' journeys as they fled. Plaintiff Zaeeton Haji now suffers from depression stemming from fear for her family's well-being following the invasion.

1567. ISIS looted and destroyed Plaintiffs Qasim Pir, Zaeeton Haji, and Hadeel Pirali's real and personal property.

1568. As a result of ISIS's invasion, Plaintiffs Qasim Pir, Zaeeton Haji, and Hadeel Pirali have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Faris Pirali and Kali Pirali**

1569. Plaintiffs Faris Pirali and Kali Pirali are citizens of the United States and domiciled in the state of Washington. Plaintiff Faris Pirali and Plaintiff Kali Pirali are married.

1570. Plaintiffs Faris Pirali and Kali Pirali have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1571. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Faris Pirali and Kali Pirali's families fled Sinjar. Some of their family members fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Others fled directly to Kurdistan. Plaintiffs Faris Pirali and Kali Pirali fearfully followed their families' journeys as they fled. ISIS killed Plaintiff Kali Pirali's aunt, and Plaintiff Kali Pirali's cousin is missing.

1572. ISIS looted and destroyed Plaintiffs Faris Pirali and Kali Pirali's real and personal property.

1573. As a result of ISIS's invasion, Plaintiffs Faris Pirali and Kali Pirali have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Basima Ali and Zaedo Ali**

1574. Plaintiffs Basima Ali and Zaedo Ali are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Basima Ali and Plaintiff Zaedo Ali are married.

1575. Plaintiffs Basima Ali and Zaedo Ali have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1576. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Basima Ali's uncles and their families and Plaintiff Zaedo Ali's mother, siblings and their families, and cousins fled Sinjar. Some of their family members fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Basima Ali and Zaedo Ali fled Iraq before the invasion, after they received threats for cooperating with the U.S. military. Plaintiffs Basima Ali and Zaedo Ali fearfully followed their families' journeys as they fled. ISIS killed Plaintiff Zaedo Ali's aunt and cousin's son. Plaintiff Basima Ali now suffers from nightmares and anxiety, for which she takes medication, following the invasion.

1577. ISIS looted and destroyed Plaintiffs Basima Pir Ali and Zaedo Ali's real and personal property.

1578. As a result of ISIS's invasion, Plaintiffs Basima Pir Ali and Zaedo Ali have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khaleel Ali**

1579. Plaintiff Khaleel Ali is a citizen of the United States and domiciled in the state of Nebraska.

1580. Plaintiff Khaleel Ali has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1581. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khaleel Ali's family, including his son, mother, siblings, and their families, fled Sinjar. Some family members fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Others fled directly to Kurdistan. Plaintiff Khaleel Ali fearfully followed his family's journey as they fled. ISIS attacked and shot at Plaintiff Khaleel Ali's family as they fled. ISIS killed Plaintiff Khaleel Ali's aunt and cousin.

1582. ISIS looted and destroyed Plaintiff Khaleel Ali's real and personal property.

1583. As a result of ISIS's invasion, Plaintiff Khaleel Ali has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of this family's society and counsel.

**Khudhur Dnai**

1584. Plaintiff Khudhur Dnai is a citizen of the United States and domiciled in the state of Nebraska.

1585. Plaintiff Khudhur Dnai has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1586. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khudhur Dnai fled to Sinjar Mountain with his wife and children, where they were trapped until they were able to escape to Kurdistan. ISIS killed Plaintiff Khudhur Dnai's brother. ISIS captured Plaintiff Khudhur Dnai's cousin, who escaped but then died because of injuries sustained during his capture.

1587. ISIS looted and destroyed Plaintiff Khudhur Dnai's real and personal property.

1588. As a result of ISIS's invasion, Plaintiff Khudhur Dnai has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Shaha Mohammed and Saeed Salo**

1589. Plaintiffs Shaha Mohammed and Saeed Salo are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Shaha Mohammed and Plaintiff Saeed Salo are married.

1590. Plaintiffs Shaha Mohammed and Saeed Salo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1591. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Shaha Mohammed and Saeed Salo fled to Sinjar Mountain with their children and Plaintiff Saeed Salo's family, where they were trapped until they were able to escape to Kurdistan. While on Sinjar Mountain, Plaintiff Shaha Mohammed sustained injuries from a scorpion bite and her sister-in-law had a stillborn birth.

1592. ISIS looted and destroyed Plaintiffs Shaha Mohammed and Saeed Salo's real and personal property.

1593. As a result of ISIS's invasion, Plaintiffs Shaha Mohammed and Saeed Salo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property, and/or loss of their family's society and counsel.

**Sabah Barakat and Hanan Ibrahim**

1594. Plaintiffs Sabah Barakat and Hanan Ibrahim are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Sabah Barakat and Hanan Ibrahim are married.

1595. Plaintiffs Sabah Barakat and Hanan Ibrahim have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1596. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Sabah Barakat and Hanan Ibrahim fled to Sinjar Mountain with Plaintiff Sabah Barakat's parents, brothers, and sisters, where they were trapped until they were able to escape to Kurdistan. ISIS killed Plaintiff Hanan Ibrahim's male cousins and captured her female cousins, many of whom are still missing.

1597. ISIS looted and destroyed Plaintiffs Sabah Barakat and Hanan Ibrahim's real and personal property.

1598. As a result of ISIS's invasion, Plaintiffs Sabah Barakat and Hanan Ibrahim have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss their family's society and counsel.

**Saeed Qasim and Saada Murad**

1599. Plaintiffs Saeed Qasim and Saada Murad are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Saeed Qasim and Saada Murad are married.

1600. 1240. Plaintiffs Saeed Qasim and Saada Murad have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1601. 1241. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Saeed Qasim and Saada Mura fled to Sinjar Mountain with their children, where they were trapped until they were able to escape to Kurdistan. ISIS killed Plaintiff Saeed Qasim's grandmother and Plaintiff Saada Murad's grandfather.

1602. ISIS looted and destroyed Plaintiffs Saeed Qasim and Saada Murad's real and personal property.

1603. As a result of ISIS's invasion, Plaintiffs Saeed Qasim and Saada Murad have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Tariq Qasim, Trko Omar, Y.T., and I.T.**

1604. Plaintiffs Tariq Qasim, Trko Omar, Y.T., and I.T. are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Tariq Qasim and Plaintiff Trko Omar are married. Plaintiffs Y.T. and I.T. are their children.

1605. Plaintiffs Tariq Qasim, Trko Omar, Y.T., and I.T. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1606. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Tariq Qasim's family, including his brother and his brother's family, and Plaintiff Trko Omar's family, including her parents, siblings, and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Tariq Qasim, Trko Omar, Y.T., and I.T. fearfully followed their families' journeys as they fled. ISIS killed Plaintiff Tariq Qasim's grandmother because she refused to convert to Islam. ISIS killed Plaintiff Trko Omar's aunt and cousins, including one cousin whose wife was pregnant. ISIS captured Plaintiff Trko Omar's female cousins, killing one and disposing of her body in the street. The rest of the cousins are still missing. Several of Plaintiff Trko Omar's family members died by suicide following the invasion.

1607. ISIS looted and destroyed Plaintiffs Tariq Qasim's, Trko Omar's, Y.T.'s, and I.T.'s real and personal property.

1608. As a result of ISIS's invasion, Plaintiffs Tariq Qasim, Trko Omar, Y.T., and I.T. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Kawry Omar**

1609. Plaintiff Kawry Omar is a citizen of the United States and domiciled in the state of Nebraska.



1610. Plaintiff Kawry Omar has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1611. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Kawry Omar fled to Sinjar Mountain with her parents, siblings, and cousins, where they were trapped until they were able to escape to Kurdistan. Plaintiff Kawry Omar's aunt, who was like a mother to her, was captured by ISIS and her whereabouts are still unknown. Plaintiff Kawry Omar's cousin died by suicide. ISIS captured and killed several of Plaintiff Kawry Omar's aunts, uncles, and their families.

1612. ISIS looted and destroyed Plaintiff Kawry Omar's real and personal property.

1613. As a result of ISIS's invasion, Plaintiff Kawry Omar has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Ammar Mato**

1614. Plaintiff Ammar Mato is a citizen of the United States and domiciled in the state of Nebraska.

1615. Plaintiff Ammar Mato has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1616. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ammar Mato fled to Kurdistan with his parents and siblings. Plaintiff Ammar Mato's father later died of illnesses which he suffered following the invasion.

1617. ISIS looted and destroyed Plaintiff Ammar Mato's real and personal property.

1618. As a result of ISIS's invasion, Plaintiff Ammar Mato has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Barakat Mato**

1619. Plaintiff Barakat Mato is a citizen of the United States and domiciled in the state of Nebraska.

1620. Plaintiff Barakat Mato has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1621. In particular, on or about August 3, 2014, in response to ISIS's invasion, Plaintiff Barakat Mato's family fled to Kurdistan while his in-laws fled to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan. Plaintiff Barakat Mato fearfully followed his family's journey as they fled.

1622. ISIS looted and destroyed Plaintiff Barakat Mato's real and personal property.

1623. As a result of ISIS's invasion, Plaintiff Barakat Mato has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Bahar Hamo**

1624. Plaintiff Bahar Hamo is a citizen of the United States and domiciled in the state of Nebraska.

1625. Plaintiff Bahar Hamo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1626. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Bahar Hamo's family, including her husband, children, husband's family, uncles, and aunts, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Bahar Hamo, who was then pregnant with twins, fearfully followed her family's journey as they fled. ISIS captured Plaintiff Bahar Hamo's cousin and her cousin's children and held them captive for three years until they escaped. In captivity, ISIS took videos of

Plaintiff Bahar Hamo's cousin and cousin's children and used them as hostages for safe passage. ISIS killed Plaintiff Bahar Hamo's cousin-in-law.

1627. ISIS looted and destroyed Plaintiff Bahar Hamo's real and personal property.

1628. As a result of ISIS's invasion, Plaintiff Bahar Hamo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Naeif Hamo and Ghalya Samokee**

1629. Plaintiffs Naeif Hamo and Ghalya Samokee are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Naeif Hamo and Ghalya Samokee are married.

1630. Plaintiffs Naeif Hamo and Ghalya Samokee have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1631. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ghalya Samokee fled to Sinjar Mountain with her parents, siblings, and their families, where they were trapped until they could escape to Kurdistan. Plaintiff Ghalya Samokee's mother broke her leg while on the mountain. ISIS captured Plaintiff Ghalya Samokee's sister and her sister's family and in-laws. Plaintiff Ghalya Samokee's sister and children were in captivity for three years before they were released. Her sister's husband and in-laws are still missing. Plaintiff Ghalya Samokee's uncles and aunts and their families were also captured by ISIS, and most are still missing. Plaintiff Naeif Hamo's aunts and uncles were all forced to flee to Kurdistan. Plaintiff Naeif Hamo fearfully followed his family's journey as they fled. Two of Plaintiff Naeif Hamo's relatives died while in temporary camps in Kurdistan.

1632. ISIS looted and destroyed Plaintiffs Naeif Hamo and Ghalya Samokee's real and personal property.

1633. As a result of ISIS's invasion, Plaintiffs Naeif Hamo and Ghalya Samokee have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of their family's society and counsel.

**Hazim Aldakhi and Sanan Aldakhi**

1634. Plaintiffs Hazim Aldakhi and Sanan Aldakhi are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Hazim Aldakhi and Sanan Aldakhi are brothers.

1635. Plaintiffs Hazim Aldakhi and Sanan Aldakhi have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1636. In particular, on or about August 3, 2014, in response to ISIS's invasion Sinjar, Iraq, Plaintiffs Hazim Aldakhi and Sanan Aldakhi fled to Sinjar Mountain with their parents, brothers, and brothers' families, where they were trapped until they were able to escape to Kurdistan. ISIS killed two of Plaintiffs Hazim Aldakhi and Sanan Aldakhi's uncles.

1637. ISIS looted and destroyed Plaintiff Hazim Aldakhi and Sanan Aldakhi's real and personal property.

1638. As a result of ISIS's invasion, Plaintiffs Hazim Aldakhi and Sanan Aldakhi have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Kozi Hussein and Mando Mtro**

1639. Plaintiffs Kozi Hussein and Mando Mtro are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Kozi Hussein is Plaintiff Mando Mtro's mother.

1640. Plaintiffs Kozi Hussein and Mando Mtro have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1641. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Kozi Hussein and Mando Mtro fled to Kurdistan with Plaintiff Kozi Hussein's other

children (Plaintiff Mando Mtro's siblings). ISIS captured Plaintiff Kozi Hussein's sister with her family until they were able to escape. Plaintiff Kozi Hussein's brother-in-law later died following the capture.

1642. ISIS looted and destroyed Plaintiff Kozi Hussein and Mando Mtro's real and personal property.

1643. As a result of ISIS's invasion, Plaintiffs Kozi Hussein and Mando Mtro have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Basima Mtro**

1644. Plaintiff Basima Mtro is a citizen of the United States and domiciled in the state of Nebraska.

1645. Plaintiff Basima Mtro has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1646. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Basima Mtro fled to Kurdistan with her parents and siblings. ISIS captured two of Plaintiff Basima Mtro's aunts with their families. Plaintiff Basima Mtro's aunts were later released. ISIS killed one of Plaintiff Basima Mtro's cousins.

1647. ISIS looted and destroyed Plaintiff Basima Mtro's real and personal property.

1648. As a result of ISIS's invasion, Plaintiff Basima Mtro has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Shafiq Abdullah**

1649. Plaintiff Shafiq Abdullah is a citizen of the United States and domiciled in the state of Nebraska.

1650. Plaintiff Shafiq Abdullah has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1651. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Shafiq Abdullah's family, including his parents, siblings, and sibling's families, fled to Kurdistan. Plaintiff Shafiq Abdullah fearfully followed his family's journey as they fled. ISIS captured several of Plaintiff Shafiq Abdullah's uncles and cousins. One of Plaintiff Shafiq Abdullah's cousins is still missing. Plaintiff Shafiq Abdullah's niece was held captive by ISIS for eight months. ISIS likewise captured Plaintiff Shafiq Abdullah's sister and her family while they were fleeing to Syria. Plaintiff Shafiq Abdullah's sister and her husband escaped, but ISIS killed the sister's uncle-in-law.

1652. ISIS looted and destroyed Plaintiff Shafiq Abdullah's real and personal property.

1653. As a result of ISIS's invasion, Plaintiff Shafiq Abdullah has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Sharro Khalaf, Jani Dawood, Hadiya Hadgi, Dani Hadgi, Rima Hadgi, and Maged Hadgi**

1654. Plaintiffs Sharro Khalaf, Jani Dawood, Hadiya Hadgi, Dani Hadgi, Rima Hadgi, and Maged Hadgi are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Sharro Khalaf and Jani Dawood are married. Plaintiffs Hadiya Hadgi, Dani Hadgi, Rima Hadgi, and Maged Hadgi are their children.

1655. Plaintiffs Sharro Khalaf, Jani Dawood, Hadiya Hadgi, Dani Hadgi, Rima Hadgi, and Maged Hadgi have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1656. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Sharro Khalaf, Jani Dawood, Hadiya Hadgi, Dani Hadgi, Rima Hadgi, and Maged Hadgi family, including Plaintiff Sharro Khalaf's parents, siblings, and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Jani Dawood's parents, siblings, and their families also separately fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Sharro Khalaf, Jani Dawood, Hadiya Hadgi, Dani Hadgi, Rima Hadgi, and Maged Hadgi fearfully followed their family's journey as they fled. Plaintiff Jani Dawood's mother's heart failed and she died in Syria, while trying to reach to Kurdistan. Plaintiff Sharro Khalaf's parents and sisters-in-law also died while fleeing from ISIS. ISIS killed Plaintiff Sharro Khalaf's uncle, cousin, and nephew. ISIS captured Plaintiff Sharro Khalaf's young cousin and held her for several years until she managed to escape. Plaintiffs Jani Dawood, Rima Hadgi, and Maged Hadgi were all diagnosed with depression and anxiety at this time and medically treated. Plaintiffs Jani Dawood and Rima Hadgi still have to take medication for depression and anxiety.

1657. ISIS looted and destroyed Plaintiffs Sharro Khalaf, Jani Dawood, Hadiya Hadgi, Dani Hadgi, Rima Hadgi, and Maged Hadgi's real and personal property.

1658. As a result of ISIS's invasion, Plaintiffs Sharro Khalaf, Jani Dawood, Hadiya Hadgi, Dani Hadgi, Rima Hadgi, and Maged Hadgi have experienced economic loss, severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khaeri Hamo and Rasimia Smoqy**

1659. Plaintiffs Khaeri Hamo and Rasimia Smoqy are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Khaeri Hamo and Rasimia Smoqy are married.

1660. Plaintiffs Khaeri Hamo and Rasimia Smoqy have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1661. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khaeri Hamo and Rasimia Smoqy's families, including Plaintiff Khaeri Hamo's uncles and Plaintiff Rasimia Smoqy's parents and siblings fled to Sinjar Mountain, where they were trapped until they could escape to Kurdistan. Plaintiffs Khaeri Hamo and Rasimia Smoqy fearfully followed their families' journeys as they fled. ISIS captured one of Plaintiff Rasimia Smoqy's sisters and her family. ISIS sold Plaintiff Rasimia Smoqy's sister four times, beat her and her children, and gave her young children guns to teach them to be fighters. After three years in captivity, Plaintiff Rasimia Smoqy's sister and her children escaped.

1662. ISIS looted and destroyed Plaintiffs Khaeri Hamo and Rasimia Smoqy's real and personal property.

1663. As a result of ISIS's invasion, Plaintiffs Khaeri Hamo and Rasimia Smoqy have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Barakat Ali**

1664. Plaintiff Barakat Ali is a citizen of the United States and domiciled in the state of Nebraska.

1665. Plaintiff Barakat Ali has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1666. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Barakat Ali's mother, stepmother, siblings, and stepsiblings fled to Kurdistan. Plaintiff Barakat Ali fearfully followed his family's journey as they fled. Plaintiff Barakat Ali's mother and stepmother were severely traumatized and died following the invasion.



1667. ISIS looted and destroyed Plaintiff Barakat Ali's real and personal property.

1668. As a result of ISIS's invasion, Plaintiff Barakat Ali has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Adoulla Matto and Jihad Khalaf**

1669. Plaintiffs Adoulla Matto and Jihad Khalaf are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Adoulla Matto is Plaintiff Jihad Khalaf's mother.

1670. Plaintiffs Adoulla Matto and Jihad Khalaf have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1671. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Adoulla Matto and Jihad Khalaf's family, including Plaintiff Adoulla Matto's daughters (Plaintiff Jihad Khalaf's sisters), father, and siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Adoulla Matto and Jihad Khalaf fearfully followed their family's journey as they fled. ISIS captured Plaintiff Adoulla Matto's son (Plaintiff Jihad Khalaf's brother). He sustained a serious leg injury in captivity and escaped after approximately one year.

1672. ISIS looted and destroyed Plaintiffs Adoulla Matto and Jihad Khalaf's real and personal property.

1673. As a result of ISIS's invasion, Plaintiffs Adoulla Matto and Jihad Khalaf have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ghazal Kassem**

1674. Plaintiff Ghazal Kassem is a citizen of the United States and domiciled in the state of Nebraska.

1675. Plaintiff Ghazal Kassem has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1676. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ghazal Kassem's siblings and their families fled Sinjar. Some initially fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Others fled directly to Kurdistan. Plaintiff Ghazal Kassem fearfully followed her family's journey as they fled. ISIS killed Plaintiff Ghazal Kassem's cousin. ISIS captured two of Plaintiff Ghazal Kassem's nieces and their families, and they are still missing.

1677. ISIS looted and destroyed Plaintiff Ghazal Kassem's real and personal property.

1678. As a result of ISIS's invasion, Plaintiff Ghazal Kassem has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Nidema Malko**

1679. Plaintiff Nidema Malko is a citizen of the United States and is domiciled in the state of Nebraska.

1680. Plaintiff Nidema Malko has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1681. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nidema Malko's parents, siblings, and extended family fled their homes. Some of Plaintiff Nidema Malko's family fled directly to Kurdistan, while others fled first to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Nidema Malko fearfully followed her family's journey as they fled. ISIS captured two of Plaintiff Nidema Malko's sisters, both of whom were pregnant. One sister was released by ISIS when she fell ill.

The other sister was forced to give birth in captivity, and was taken to various locations, including in Syria, until she was able to escape from captivity approximately 5 years later.

1682. ISIS looted and destroyed Plaintiff Nidema Malko's real and personal property.

1683. As a result of ISIS's invasion, Plaintiff Nidema Malko has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Mihi Zaghla, Laila Halo, and Abas Zaghla**

1684. Plaintiffs Mihi Zaghla, Laila Halo, and Abas Zaghla are citizens of the United States and are domiciled in the state of Nebraska. Plaintiffs Mihi Zaghla and Laila Halo are married, and Plaintiff Abas Zaghla is their son.

1685. Plaintiffs Mihi Zaghla, Laila Halo, and Abas Zaghla have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1686. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Mihi Zaghla, Laila Halo, and Abas Zaghla fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. ISIS killed two of Plaintiff Mihi Zaghla's brothers, as well as his cousin and their families.

1687. ISIS looted and destroyed Plaintiffs Mihi Zaghla, Laila Halo, and Abas Zaghla's real and personal property.

1688. As a result of ISIS's invasion, Plaintiffs Mihi Zaghla, Laila Halo, and Abas Zaghla have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Sulaiman Sido and Rasmia Khalaf**

1689. Plaintiffs Sulaiman Sido and Rasmia Khalaf are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Sulaiman Sido is Plaintiff Rasmia Khalaf's father.

1690. Plaintiffs Sulaiman Sido and Rasmia Khalaf have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1691. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sulaiman Sido's brother and his family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Rasmia Khalaf's aunts and uncles likewise fled to the mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Sulaiman Sido and Rasmia Khalaf fearfully followed their family's journey as they fled. Plaintiff Rasima Khalaf's cousin was captured by ISIS until she managed to escape.

1692. As a result of ISIS's invasion, Plaintiffs Sulaiman Sido and Rasmia Khalaf have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khatoon Haskan and Y.H.**

1693. Plaintiffs Khatoon Haskan and Y.H. are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khatoon Haskan is Y.H.'s mother.

1694. Plaintiffs Khatoon Haskan and Y.H. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1695. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khatoon Haskan and Y.H. fled to Kurdistan by car with Plaintiff Khatoon Haskan's husband and his family. Plaintiff Khatoon Haskan was pregnant at the time. Plaintiff Khatoon Haskan's father subsequently died. ISIS captured Plaintiff Khatoon Haskan's cousin and her cousin's husband, and killed Plaintiff Khatoon Haskan's cousin's husband.

1696. ISIS looted and destroyed Plaintiffs Khatoon Haskan and Y.H.'s real and personal property.

1697. As a result of ISIS's invasion, Plaintiffs Khatoon Haskan and Y.H. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Nawaf Haskan**

1698. Plaintiff Nawaf Haskan is a citizen of the United States and domiciled in the state of Nebraska.

1699. Plaintiff Nawaf Haskan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1700. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nawaf Haskan's family, including her parents, siblings, and uncles, fled to Kurdistan. Plaintiff Nawaf Haskan fearfully followed his family's journey as they fled. Plaintiff Nawaf Haskan now suffers from post-traumatic stress disorder and depression following the invasion.

1701. ISIS looted and destroyed Plaintiff Nawaf Haskan's real and personal property.

1702. As a result of ISIS's invasion, Plaintiff Nawaf Haskan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Laila Saleh**

1703. Plaintiff Laila Saleh is a citizen of the United States and domiciled in the state of Nebraska.

1704. Plaintiff Laila Saleh has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1705. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Laila Saleh fled to Kurdistan with her parents and siblings. ISIS killed Plaintiff Laila Saleh's father's cousin and captured his cousin's family.

1706. ISIS looted and destroyed Plaintiff Laila Saleh's real and personal property.

1707. As a result of ISIS's invasion, Plaintiff Laila Saleh has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Omar Hussein, Bezar Ahmed, Marwan Khalaf, Saeed Khalaf, Saleh Khalaf and Miyan Khalaf**

1708. Plaintiffs Omar Hussein, Bezar Ahmed, Marwan Khalaf, Saeed Khalaf, Saleh Khalaf and Miyan Khalaf are citizens of the United States and domiciled in the state of Arizona. Plaintiffs Marwan Khalaf, Saeed Khalaf, Saleh Khalaf and Miyan Khalaf are Plaintiffs Omar Hussein and Bezar Ahmed's children.

1709. Plaintiffs Omar Hussein, Bezar Ahmed, Marwan Khalaf, Saeed Khalaf, Saleh Khalaf and Miyan Khalaf have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1710. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Omar Hussein's siblings and Plaintiff Bezar Ahmad's family, including her brother, sisters, and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Omar Hussein, Bezar Ahmed, Marwan Khalaf, Saeed Khalaf, Saleh Khalaf and Miyan Khalaf fearfully followed their families' journeys as they fled. Plaintiff Bezar Ahmad's family was captured by ISIS. They were forced into a cave, and were only able to escape when the ISIS members received a phone call and had to leave. Most of Plaintiff Bezar

Ahmad's family members had to flee without any shoes, and so they suffered injuries to their feet. Plaintiff Omar Hussein's sister also injured her feet while fleeing, and later had to have her toes amputated. Plaintiff Omar Hussein's sister and one brother recently passed away due to the hardship they suffered while fleeing. ISIS captured and killed two of Plaintiff Omar Hussein's cousins. ISIS captured and later released three of Plaintiff Omar Hussein's other cousins.

1711. ISIS looted and destroyed Plaintiffs Omar Hussein, Bezar Ahmed, Marwan Khalaf, Saeed Khalaf, Saleh Khalaf and Miyan Khalaf's real and personal property.

1712. As a result of ISIS's invasion, Plaintiffs Omar Hussein, Bezar Ahmed, Marwan Khalaf, Saeed Khalaf, Saleh Khalaf and Miyan Khalaf have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property, and/or the loss of their family's society and counsel.

**Raeda Ghanem**

1713. Plaintiff Raeda Ghanem is a citizen of the United States and domiciled in the state of Arizona.

1714. Plaintiff Raeda Ghanem has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1715. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, some of Plaintiff Raeda Ghanem's family, including her maternal uncles, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. While fleeing to Sinjar Mountain, Plaintiff Raeda Ghanem's cousin's sister-in-law, who was fourteen years old at the time, was captured by ISIS and has not been seen since. Other family members, including her grandmother and paternal uncles, fled directly to Kurdistan. While they were fleeing to Kurdistan,

one of their cars broke down and so half the family was forced to walk, while also carrying Plaintiff Raeda Ghanem's elderly grandmother.

1716. As a result of ISIS's invasion, Plaintiff Raeda Ghanem experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Zahra Osman**

1717. Plaintiff Zahra Osman is a citizen of the United States and domiciled in the state of Arizona.

1718. Plaintiff Zahra Osman has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1719. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Zahra Osman's family, including her aunts, uncles, cousins, and grandmother, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Zahra Osman fearfully followed her family's journey as they fled.

1720. ISIS looted and destroyed Plaintiff Zahra Osman's real and personal property.

1721. As a result of ISIS's invasion, Plaintiff Zahra Osman has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; and loss of property.

**Taha Abdullah and Mulhim Abdullah**

1722. Plaintiffs Taha Abdullah and Mulhim Abdullah are a citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Taha Abdullah and Mulhim Abdullah are brothers.

1723. Plaintiffs Taha Abdullah and Mulhim Abdullah have suffered severe injuries as a result of ISIS's campaign targeting Yazidis in Iraq.



1724. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Taha Abdullah and Mulhim Abdullah fled to Kurdistan with their mother and siblings.

1725. ISIS looted and destroyed Plaintiffs Taha Abdullah and Mulhim Abdullah's real and personal property.

1726. As a result of ISIS's invasion, Plaintiffs Taha Abdullah and Mulhim Abdullah have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of their family's society and counsel.

**Hanan Smoqy**

1727. Plaintiff Hanan Smoqy is a citizen of the United States and domiciled in the state of Nebraska.

1728. Plaintiff Hanan Smoqy has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1729. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hanan Smoqy's uncles, together with their families, fled to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan. Plaintiff Hanan Smoqy fearfully followed her family's journey as they fled. Plaintiff Hanan Smoqy's great-grandfather was injured while fleeing from ISIS and died a short time later from his injuries. Plaintiff Hanan Smoqy's best friend committed suicide after experiencing the traumatic invasion of her hometown. Since the invasion, Plaintiff Hanan Smoqy has developed anxiety and PTSD that makes her sensitive to loud noises and extremely anxious when around non-Yazidi individuals, scared that she will be targeted like her cousins in Sinjar were.

1730. ISIS looted and destroyed Plaintiff Hanan Smoqy's real and personal property.

1731. As a result of ISIS's invasion, Plaintiff Hanan Smoqy has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of her family's society and counsel.

**Jamal Al Dakhi, Gawri Al Dakhi, Ruba Aldakhi, and Fadia Al Dakhi**

1732. Plaintiffs Jamal Al Dakhi, Gawri Al Dakhi, Ruba Aldakhi, and Fadia Al Dakhi are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Jamal Al Dakhi and Plaintiff Gawri Al Dakhi are married. Plaintiff Ruba Aldakhi is their daughter and Plaintiff Fadia Al Dakhi is their sister-in-law.

1733. Plaintiffs Jamal Al Dakhi, Gawri Al Dakhi, Ruba Aldakhi, and Fadia Al Dakhi have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1734. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Jamal Al Dakhi and Gawri Al Dakhi fled to Kurdistan with their children (including Plaintiff Ruba Aldakhi), Plaintiff Fadia Al Dakhi, Plaintiff Gawri Al Dakhi's mother and siblings, and Plaintiff Jamal Al Dakhi's mother. Plaintiff Gawri Al Dakhi was pregnant at the time. ISIS killed Plaintiff Jamal Al Dakhi's father and uncle and shot at his brother. Plaintiff Jamal Al Dakhi, a former contractor for the U.S. Army, received death threats from ISIS due to his association with the U.S. military. Plaintiff Fadia Al Dakhi's parents and siblings separately fled to Sinjar Mountain, where they were trapped until they could escape to Kurdistan. Her uncle was captured by ISIS, and is still missing. As a result of the invasion, Plaintiff Ruba Aldakhi suffered from seizures for four years for which she received medical treatment.

1735. ISIS looted and destroyed Plaintiffs Jamal Al Dakhi, Gawri Al Dakhi, Ruba Aldakhi, and Fadia Al Dakhi's real and personal property.

1736. As a result of ISIS's invasion, Plaintiffs Jamal Al Dakhi, Gawri Al Dakhi, Ruba Aldakhi, and Fadia Al Dakhi have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property, and/or loss of their family's society and counsel.

**Alyas Aldakhi**

1737. Plaintiff Alyas Aldakhi is a citizen of the United States and domiciled in the state of Nebraska.

1738. Plaintiff Alyas Aldakhi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1739. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Alyas Aldakhi fled to Kurdistan with his neighbors. Some of Plaintiff Alyas Aldakhi's family members fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Others fled directly to Kurdistan. ISIS killed Plaintiff Alyas Aldakhi's father and uncle and shot at his brother, who fled to Sinjar Mountain.

1740. ISIS looted and destroyed Plaintiff Alyas Aldakhi's real and personal property.

1741. As a result of ISIS's invasion, Plaintiff Alyas Aldakhi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Darwish Darwish**

1742. Plaintiff Darwish Darwish is a citizen of the United States and domiciled in the state of Nebraska.

1743. Plaintiff Darwish Darwish has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1744. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Darwish Darwish, his parents, and his siblings fled to a village near Sinjar Mountain

where they stayed until they were able to escape to Kurdistan. While escaping, ISIS was shooting at Plaintiff Darwish Darwish's car. ISIS killed two of Plaintiff Darwish Darwish's great uncles and two of his father's cousins. ISIS also captured Plaintiff Darwish Darwish's aunt and her family and held them captive for three nights until they were able to escape.

1745. ISIS looted and destroyed Plaintiff Darwish Darwish's real and personal property.

1746. As a result of ISIS's invasion, Plaintiff Darwish Darwish has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Zozan Hiskan and Hussein Hskan**

1747. Plaintiffs Zozan Hiskan and Hussein Hskan are citizens of the United States and domiciled in the state of Nebraska.

1748. Plaintiffs Zozan Hiskan and Hussein Hskan have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1749. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Zozan Hiskan and Hussein Hskan fled to Kurdistan with their children, grandchildren, and extended family. Their daughter was unwell at the time and had multiple seizures while fleeing from ISIS. She is now non-verbal and needs assistance with basic tasks like eating and dressing herself. Their son also developed an eye condition since the invasion, which required surgery.

1750. ISIS looted and destroyed Plaintiffs Zozan Hiskan and Hussein Hskan's real and personal property.

1751. As a result of ISIS's invasion, Plaintiffs Zozan Hiskan and Hussein Hskan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of their family's society and counsel.

**Jani Al Dakhee and Jamal Mastu**

1752. Plaintiffs Jani Al Dakhee and Jamal Mastu are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Jani Al Dakhee and Plaintiff Jamal Mastu are married.

1753. Plaintiffs Jani Al Dakhee and Jamal Mastu have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1754. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Jani Al Dakhee's parents and siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. On their way to the mountain, ISIS captured them briefly, but they escaped. Plaintiff Jamal Mastu's parents, siblings, and their families also fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Jani Al Dakhee and Jamal Mastu fearfully followed their families' journeys as they fled.

1755. ISIS looted and destroyed Plaintiff Jani Al Dakhee's and Plaintiff Jamal Mastu's real and personal property.

1756. As a result of ISIS's invasion, Plaintiffs Jani Al Dakhee and Jamal Mastu have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of their family's society and counsel.

**Kawi Kasem**

1757. Plaintiff Kawi Kasem is a citizen of the United States and domiciled in the state of Nebraska.

1758. Plaintiff Kawi Kasem has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1759. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Kawi Kasem's sister and her family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Kawi Kasem's grandmother, her uncle, and her uncle's family fled directly to Kurdistan. ISIS captured one of Plaintiff Kawi Kasem's nieces, but she was able to escape to Sinjar Mountain. Plaintiff Kawi Kasem fearfully followed her family's journey as they fled.

1760. ISIS looted and destroyed Plaintiff Kawi Kasem's real and personal property.

1761. As a result of ISIS's invasion, Plaintiff Kawi Kasem has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of her family's society and counsel.

**Nofa Ismael**

1762. Plaintiff Nofa Ismael is a citizen of the United States and domiciled in the state of Nebraska.

1763. Plaintiff Nofa Ismael has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1764. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nofa Ismael fled to Sinjar Mountain with her husband, children, and their families, where they were trapped until they were able to escape to Kurdistan. ISIS captured Plaintiff Nofa Ismael's mother-in-law, brothers-in-law, and sisters-in-law and their families. Plaintiff Nofa Ismael's mother-in-law and one young child managed to escape, but the whereabouts of the other family members are still unknown. Plaintiff Nofa Ismael's grandmother died while in a camp for internally displaced persons in Kurdistan.

1765. ISIS looted and destroyed Plaintiff Nofa Ismael's real and personal property.

1766. As a result of ISIS's invasion, Plaintiff Nofa Ismael has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Rifaah Hussein**

1767. Plaintiff Rifaah Hussein is a citizen of the United States and domiciled in the state of Nebraska.

1768. Plaintiff Rifaah Hussein has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1769. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Rifaah Hussein's parents, uncles, cousins, siblings, and their families fled to Kurdistan. Some of Plaintiff Rifaah Hussein's family fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Rifaah Hussein fearfully followed her family's journey as they fled. Plaintiff Rifaah Hussein's father had a stroke, and her mother began suffering from heart disease after the invasion, while in the camps for internally displaced persons in Kurdistan.

1770. ISIS looted and destroyed Plaintiff Rifaah Hussein's real and personal property.

1771. As a result of ISIS's invasion, Plaintiff Rifaah Hussein has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Hawri Jndo**

1772. Plaintiff Hawri Jndo is a citizen of the United States and domiciled in the state of Nebraska.

1773. Plaintiff Hawri Jndo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1774. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hawri Jndo fled to Sinjar Mountain with her children, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hawri Jndo fell while fleeing, resulting in permanent injury to her right hand. ISIS killed Plaintiff Hawri Jndo's cousin.

1775. ISIS looted and destroyed Plaintiff Hawri Jndo's real and personal property.

1776. As a result of ISIS's invasion, Plaintiff Hawri Jndo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Muhsin Aljando, Amena Maaao, and D.A.**

1777. Plaintiffs Muhsin Aljando, Amena Maaao, and D.A. are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Muhsin Aljando and Amena Maaao are married. Plaintiff D.A. is their child.

1778. Plaintiffs Muhsin Aljando, Amena Maaao, and D.A. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1779. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Muhsin Aljando and Amena Maaao fled to Sinjar Mountain with Plaintiff D.A., their other children, and Plaintiff Muhsin Aljando's mother and siblings, where they were trapped until they were able to escape to Kurdistan. Plaintiff D.A. had recently had surgery which required a metal plate to be placed into his leg. While fleeing from ISIS, the metal plate broke, causing Plaintiff D.A. immense pain. ISIS killed Plaintiff Amena Maaao's grandfather's cousins.



1780. ISIS looted and destroyed Plaintiffs Muhsin Aljando, Amena Maaou, and D.A.'s real and personal property.

1781. As a result of ISIS's invasion, Plaintiffs Muhsin Aljando, Amena Maaou, and D.A. have experienced severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of their family's society and counsel.

**Zaa'im Ali, Hazzo Besho, Linda Osman, Nasima Osman, Souriya Osman, Samirah Osman, Noura Osman, and Nada Osman**

1782. Plaintiffs Zaa'im Ali, Hazzo Besho, Linda Osman, Nasima Osman, Souriya Osman, Samirah Osman, Noura Osman, and Nada Osman are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Zaa'im Ali and Hazzo Besho are the parents of Linda Osman, Nasima Osman, Souriya Osman, Samirah Osman, Noura Osman, and Nada Osman.

1783. Plaintiffs Zaa'im Ali, Hazzo Besho, Linda Osman, Nasima Osman, Souriya Osman, Samirah Osman, Noura Osman, and Nada Osman have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1784. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Zaa'im Ali's family, including his siblings and uncles fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hazzo Besho's mother, siblings, and their children, including Plaintiff Hazzo Besho's disabled nephew, also fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Zaa'im Ali, Hazzo Besho, Linda Osman, Nasima Osman, Souriya Osman, Samirah Osman, Noura Osman, and Nada Osman fearfully followed their family's journey as they fled. ISIS captured Plaintiff Hazzo Besho's brother and niece. They eventually managed to escape but Plaintiff Hazzo Besho's brother suffered from post traumatic stress disorder, and eventually died. Plaintiff Hazzo Besho's

niece still lives in fear as a result of her time in captivity. ISIS beheaded Plaintiff Souriya Osman's father-in-law and his brother, who were too elderly to flee their villages.

1785. ISIS looted and destroyed Plaintiffs Zaa'im Ali, Hazzo Besho, Linda Osman, Nasima Osman, Souriya Osman, Samirah Osman, Noura Osman, and Nada Osman's real and personal property.

1786. As a result of ISIS's invasion, Plaintiffs Zaa'im Ali, Hazzo Besho, Linda Osman, Nasima Osman, Souriya Osman, Samirah Osman, Noura Osman, and Nada Osman have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khansa Khalaf, Asia Ali, and Ibrahim Ali**

1787. Plaintiffs Khansa Khalaf, Asia Ali, and Ibrahim Ali are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khansa Khalaf is Plaintiffs Asia Ali and Ibrahim Ali's mother.

1788. Plaintiffs Khansa Khalaf, Asia Ali, and Ibrahim Ali have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1789. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khansa Khalaf's family, including her husband (Plaintiff Asia Ali and Ibrahim Ali's father), her siblings, and their families fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Asia Ali and Ibrahim Ali's step-siblings also fled with their father. Plaintiffs Khansa Khalaf, Asia Ali, and Ibrahim Ali fearfully followed their family's journey as they fled. ISIS killed Plaintiff Khansa Khalaf's nephew. Plaintiff Khansa Khalaf now suffers from depression that requires medication following the invasion.

1790. ISIS looted and destroyed Plaintiffs Khansa Khalaf, Asia Ali, and Ibrahim Ali's real and personal property.

1791. As a result of ISIS's invasion, Plaintiffs Khansa Khalaf, Asia Ali, and Ibrahim Ali have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Dalal Semoqi**

1792. Plaintiff Dalal Semoqi is a citizen of the United States and domiciled in the state of Nebraska.

1793. Plaintiff Dalal Semoqi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1794. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Dalal Semoqi's parents, siblings, and extended family fled to Kurdistan. Plaintiff Dalal Semoqi fearfully followed her family's journey as they fled. Plaintiff Dalal Semoqi's uncle, aunt, cousins, and grandmother fled onwards to Greece out of fear that ISIS would come to Kurdistan. All but Plaintiff Dalal Semoqi's uncle drowned while trying to reach Greece. Plaintiff Dalal Semoqi now suffers from chronic depression and anxiety following the invasion.

1795. ISIS looted and destroyed Plaintiff Dalal Semoqi's real and personal property.

1796. As a result of ISIS's invasion, Plaintiff Dalal Semoqi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Parween Chiyan and Qasim Guly**

1797. Plaintiffs Parween Chiyan and Qasim Guly are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Parween Chiyan and Plaintiff Qasim Guly are married.

1798. Plaintiffs Parween Chiyan and Qasim Guly have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1799. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Parween Chiyan, who was pregnant at the time, and Plaintiff Qasim Guly fled to Kurdistan with Plaintiff Qasim Guly's mother and siblings. Plaintiff Parween Chiyan's mother and siblings fled separately to Kurdistan. ISIS killed Plaintiff Parween Chiyan's cousin and Plaintiff Qasim Guly's cousin.

1800. ISIS looted and destroyed Plaintiffs Parween Chiyan and Qasim Guly's real and personal property.

1801. As a result of ISIS's invasion, Plaintiffs Parween Chiyan and Qasim Guly have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Salih Rashki, Wansa Rashki, Salah Omar, and Hanan Omar**

1802. Plaintiffs Salih Rashki, Wansa Rashki, Salah Omar, and Hanan Omar are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Salih Rashki and Plaintiff Wansa Rashki are married. Plaintiffs Salah Omar and Hanan Omar are their children.

1803. Plaintiffs Salih Rashki, Wansa Rashki, Salah Omar, and Hanan Omar have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1804. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Salih Rashki's family, including his parents, uncles, siblings, and their children, and Plaintiff Wansa Rashki's siblings and extended family fled to Kurdistan. Plaintiffs Salih Rashki, Wansa Rashki, Salah Omar, and Hanan Omar fearfully followed their families' journeys as they fled. ISIS captured Plaintiff Salih Rashki's sister and brother-in-law (Plaintiff Wansa Rashki's brother and sister-in-law) and their children. Five of the children have since escaped, however the parents and the remaining two children are still missing.

1805. ISIS looted and destroyed Plaintiffs Salih Rashki, Wansa Rashki, Salah Omar, and Hanan Omar's real and personal property.

1806. As a result of ISIS's invasion, Plaintiffs Salih Rashki, Wansa Rashki, Salah Omar, and Hanan Omar have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Kudida Shamo and Gawry Shamo**

1807. Plaintiffs Kudida Shamo and Gawry Shamo are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Kudida Shamo and Plaintiff Gawry Shamo are married.

1808. Plaintiffs Kudida Shamo and Gawry Shamo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1809. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, most of Plaintiff Kudida Shamo's siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Some of Plaintiff Gawry Shamo's siblings also fled to the mountain, whereas her parents and other siblings fled directly to Kurdistan. Plaintiff Kudida Shamo and Plaintiff Gawry Shamo fearfully followed their families' journeys as they fled. ISIS captured and tortured Plaintiff Kudida Shamo's brother for a month, until he was able to escape. Plaintiff Kudida Shamo's brother was traumatized by this experience and has attempted suicide multiple times. Other members of Plaintiff Kudida Shamo's family, including an uncle and cousins, were captured by ISIS, and some are still missing. Plaintiff Gawry Shamo's grandmother and cousin were left in the village and ISIS killed them. Plaintiff Kudida Shamo had to stop his education for one year, and Plaintiff Gawry Shamo now suffers from insomnia and other health issues following the invasion.

1810. ISIS looted and destroyed Plaintiffs Kudida Shamo and Gawry Shamo's real and personal property.

1811. As a result of ISIS's invasion, Plaintiffs Kudida Shamo and Gawry Shamo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Wansa Aldkhi and Khalil Hakan**

1812. Plaintiffs Wansa Aldkhi and Khalil Hakan are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Wansa Aldkhi and Plaintiff Khalil Hakan are married.

1813. Plaintiffs Wansa Aldkhi and Khalil Hakan have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1814. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Wansa Aldkhi's family, including her father, siblings, uncles, and aunts and Plaintiff Khalil Hakan's family, including his father, siblings, and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Wansa Aldkhi and Khalil Hakan fearfully followed their families' journeys as they fled. ISIS captured Plaintiff Wansa Aldkhi's brother, but he escaped. Plaintiff Wansa Aldkhi's uncle, cousins, and their families disappeared. Plaintiff Wansa Adkhi's father suffered from shock and memory loss because of what happened to her uncle. Plaintiff Wansa Aldkhi now suffers from insomnia following the invasion.

1815. ISIS looted and destroyed Plaintiffs Wansa Aldkhi and Khalil Hakan's real and personal property.

1816. As a result of ISIS's invasion, Plaintiffs Wansa Aldkhi and Khalil Hakan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Sam Mirza**

1817. Plaintiff Sam Mirza is a citizen of the United States and domiciled in the state of Nebraska.

1818. Plaintiff Sam Mirza has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1819. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sam Mirza's family, including his parents, siblings, including one who was pregnant, and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Sam Mirza fearfully followed his family's journey as they fled.

1820. ISIS looted and destroyed Plaintiff Sam Mirza's real and personal property.

1821. As a result of ISIS's invasion, Plaintiff Sam Mirza has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Rasho Haso**

1822. Plaintiff Rasho Haso is a citizen of the United States and domiciled in the state of Nebraska.

1823. Plaintiff Rasho Haso has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1824. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq Plaintiff Rasho Haso's siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Rasho Haso fearfully followed his family's journey as they fled. ISIS captured Plaintiff Rasho Haso's sister-in-law and her family, and they are still

missing. Plaintiff Rasho Haso's wife's mother was briefly captured by ISIS, before escaping. Plaintiff Rasho Haso's wife's uncle and his family were also captured and are still missing.

1825. ISIS looted and destroyed Plaintiff Rasho Haso's real and personal property.

1826. As a result of ISIS's invasion, Plaintiff Rasho Haso has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Hadji Khalaf, Saeed Hamo, and Hamo Hamo**

1827. Plaintiffs Hadji Khalaf, Saeed Hamo, and Hamo Hamo are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Hadji Khalaf is Plaintiffs Saeed Hamo and Hamo Hamo's father.

1828. Plaintiffs Hadji Khalaf, Saeed Hamo, and Hamo Hamo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1829. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hadji Khalaf's family, including his son, daughter-in-law, grandchildren, siblings, cousins, and their families fled to Kurdistan. Plaintiffs Hadji Khalaf, Saeed Hamo, and Hamo Hamo fearfully followed their family's journey as they fled. ISIS killed Plaintiff Hadji Khalaf's niece (Plaintiffs Saeed Hamo and Hamo Hamo's cousin) and beheaded two of his cousins. ISIS killed Plaintiffs Saeed Hamo and Hamo Hamo's grandparents. Some of Plaintiff Hadji Khalaf's cousins and their families were captured by ISIS, and they are still missing. Since the invasion, Plaintiff Hadji Khalaf suffers from depression.

1830. ISIS looted and destroyed Plaintiffs Hadji Khalaf, Saeed Hamo, and Hamo Hamo's real and personal property.



1831. As a result of ISIS's invasion, Plaintiffs Hadji Khalaf, Saeed Hamo, and Hamo Hamo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of their family's society and counsel.

**Shahab Khudeeda**

1832. Plaintiff Shahab Khudeeda is a citizen of the United States and domiciled in the state of Nebraska.

1833. Plaintiff Shahab Khudeeda has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1834. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Shahab Khudeeda's aunts, uncles, and their families fled, some directly to Kurdistan, and some to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Shahab Khudeeda was already in Kurdistan at the time of the invasion. Plaintiff Shahab Khudeeda fearfully followed his family's journey as they fled.

1835. ISIS looted and destroyed Plaintiff Shahab Khudeeda's real and personal property.

1836. As a result of ISIS's invasion, Plaintiff Shahab Khudeeda has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Kejjan Hesso**

1837. Plaintiff Kejjan Hesso is a citizen of the United States and domiciled in the state of Nebraska.

1838. Plaintiff Kejjan Hesso has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1839. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Kejjan Hesso's family, including his mother and siblings, fled to Kurdistan. Plaintiff

Kejjan Hesso fearfully followed his family's journey as they fled. Plaintiff Kejjan Hesso's brother suffered a heart attack when ISIS invaded and died.

1840. ISIS looted and destroyed Plaintiff Kejjan Hesso's real and personal property.

1841. As a result of ISIS's invasion, Plaintiff Kejjan Hesso has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Luis Kosa**

1842. Plaintiff Luis Kosa is a citizen of the United States and domiciled in the state of Nebraska.

1843. Plaintiff Luis Kosa has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1844. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Luis Kosa fled to Sinjar Mountain with his parents, siblings, and their children, where they were trapped until they were able to escape to Kurdistan. ISIS captured Plaintiff Luis Kosa's uncle and aunt. Plaintiff Luis Kosa's aunt later managed to escape from captivity, however the whereabouts of his uncle are still unknown. Plaintiff Luis Kosa now suffers from poor mental health and memory loss following the invasion, which prevents him from studying.

1845. ISIS looted and destroyed Plaintiff Luis Kosa's real and personal property.

1846. As a result of ISIS's invasion, Plaintiff Luis Kosa has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Maya Lavin**

1847. Plaintiff Maya Lavin is a citizen of the United States and domiciled in the state of Nebraska.

1848. Plaintiff Maya Lavin has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1849. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Maya Lavin fled to Sinjar Mountain with her parents, siblings, and their children, where they were trapped until they managed to escape to Kurdistan. ISIS shot and killed Plaintiff Maya Lavin's cousin in front of his family, and captured his wife and children who are still missing. Since the invasion, Plaintiff Maya Lavin suffers from headaches and poor mental health.

1850. ISIS looted and destroyed Plaintiff Maya Lavin's real and personal property.

1851. As a result of ISIS's invasion, Plaintiff Maya Lavin has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of her family's society and counsel.

**Saifi Smouki and Haji Smouki**

1852. Plaintiffs Saifi Smouki and Haji Smouki are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Saifi Smouki and Plaintiff Haji Smouki are married.

1853. Plaintiffs Saifi Smouki and Haji Smouki have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1854. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saifi Smouki's parents and siblings and Plaintiff Haji Smouki's siblings fled to Kurdistan. Plaintiffs Saifi Smouki and Haji Smouki fearfully followed their families' journeys as they fled. ISIS captured Plaintiff Saifi Smouki's uncle, and he is still missing.

1855. ISIS looted and destroyed Plaintiffs Saifi Smouki and Haji Smouki's real and personal property.

1856. As a result of ISIS's invasion, Plaintiffs Saifi Smouki and Haji Smouki have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Haji Mirza**

1857. Plaintiff Haji Mirza is a citizen of the United States and domiciled in the state of Nebraska.

1858. Plaintiff Haji Mirza has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1859. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Haji Mirza fled to Sinjar Mountain with his wife, children, parents, siblings, and uncle, where they were trapped until they were able to escape to Kurdistan. Plaintiff Haji Mirza's brother fought against ISIS and was killed. ISIS captured Plaintiff Haji Mirza's uncle, his wife, and their children. His uncle later escaped, though some of his children were killed, and the rest of the family are still missing. Plaintiff Haji Mirza's uncle passed away because of the physical and mental abuse he suffered in captivity. ISIS also captured Plaintiff Haji Mirza's other uncles and their families. One uncle was killed, and remaining family members are still missing.

1860. ISIS looted and destroyed Plaintiff Haji Mirza's real and personal property.

1861. As a result of ISIS's invasion, Plaintiff Haji Mirza as experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of her family's society and counsel.

**Hussein Hilo**

1862. Plaintiff Hussein Hilo is a citizen of the United States and domiciled in the state of Nebraska.

1863. Plaintiff Hussein Hilo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1864. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hussein Hilo and his family, including his wife, children, siblings, and their families, fled to Kurdistan. As a result, Plaintiff Hussein Hilo suffers from depression that prevents him from continuing his studies.

1865. ISIS looted and destroyed Plaintiff Hussein Hilo's real and personal property.

1866. As a result of ISIS's invasion, Plaintiff Hussein Hilo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Natiq Shamo**

1867. Plaintiff Natiq Shamo is a citizen of the United States and domiciled in the state of Nebraska.

1868. Plaintiff Natiq Shamo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1869. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Natiq Shamo's family, including his parents, siblings, and their children, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Natiq Shamo fearfully followed his family's journey as they fled. Plaintiff Natiq Shamo's father suffered a heart attack right after the invasion. Plaintiff Natiq Shamo's father eventually died of another heart attack triggered by the mental and emotional toll of the invasion. ISIS killed Plaintiff Natiq Shamo's father's cousin and his son.

1870. ISIS looted and destroyed Plaintiff Natiq Shamo's real and personal property.

1871. As a result of ISIS's invasion, Plaintiff Natiq Shamo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or the loss of his family's society and counsel.

**Mohsin Hasan**

1872. Plaintiff Mohsin Hasan is a citizen of the United States and domiciled in the state of Nebraska.

1873. Plaintiff Mohsin Hasan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1874. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Mohsin Hasan fled to Kurdistan with his parents, siblings, aunts, uncles, and other families. Plaintiff Mohsin Hasan's aunt was captured by ISIS, together with her husband and children. Plaintiff Mohsin Hasan's aunt and cousins were tortured during captivity. Later they were able to escape. Plaintiff Mohsin Hasan's aunt's husband and one of her sons are still missing. Plaintiff Mohsin Hasan now suffers from emotional harm following the invasion, which has negatively impacted his studies.

1875. ISIS looted and destroyed Plaintiff Mohsin Ali Hasan's real and personal property.

1876. As a result of ISIS's invasion, Plaintiff Mohsin Hasan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Khawla Al Aisso**

1877. Plaintiff Khawla Al Aisso is a citizen of the United States and domiciled in the state of Nebraska.

1878. Plaintiff Khawla Al Aisso has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1879. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khawla Al Aisso fled to Kurdistan with her parents and siblings. ISIS captured Plaintiff Khawla Al Aisso's aunt, uncle, and cousins. Most of these relatives were later able to escape, though three of these cousins were in ISIS captivity for five years before escaping. Plaintiff Khawla Al Aisso's uncle and one cousin are still missing.

1880. ISIS looted and destroyed Plaintiff Khawla Al Aisso's real and personal property.

1881. As a result of ISIS's invasion, Plaintiff Khawla Al Aisso has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Habeeb Mtro**

1882. Plaintiff Habeeb Mtro is a citizen of the United States and domiciled in the state of Nebraska.

1883. Plaintiff Habeeb Mtro has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1884. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Habeeb Mtro fled to Kurdistan with his mother, siblings, uncles, aunts, and grandparents. Plaintiff Habeeb Mtro suffered a broken leg that required surgery after falling from an overcrowded truck while escaping.

1885. ISIS looted and destroyed Plaintiff Habeeb Mtro's real and personal property.

1886. As a result of ISIS's invasion, Plaintiff Habeeb Mtro has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property and/or loss of his family's society and counsel.

**Heivi Khalaf, Baseh Shamo, Bassemah Shamo, Bannaz Shamo, Roza Shamo, Basel Shamo, and Layla Shamo**

1887. Plaintiffs Heivi Khalaf, Baseh Shamo, Bassemah Shamo, Bannaz Shamo, Roza Shamo, Basel Shamo, and Layla Shamo are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Heivi Khalaf is the mother of Plaintiffs Baseh Shamo, Bassemah Shamo, Bannaz Shamo, Roza Shamo, Basel Shamo, and Layla Shamo .

1888. Plaintiffs Heivi Khalaf, Baseh Shamo, Bassemah Shamo, Bannaz Shamo, Roza Shamo, Basel Shamo, and Layla Shamo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1889. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Heivi Khalaf, Baseh Shamo, Bassemah Shamo, Bannaz Shamo, Roza Shamo, Basel Shamo, and Layla Shamo's family, including Plaintiff Heivi Khalaf's siblings and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Heivi Khalaf, Baseh Shamo, Bassemah Shamo, Bannaz Shamo, Roza Shamo, Basel Shamo, and Layla Shamo fearfully followed their family's journey as they fled. ISIS captured Plaintiff Heivi Khalaf's niece and her family. Plaintiff Heivi Khalaf's niece managed to escape with her children after approximately 4 years, but her husband is still missing and is presumed dead. ISIS also captured a number of Plaintiffs Baseh Shamo, Bassemah Shamo, Bannaz Shamo, Roza Shamo, Basel Shamo, and Layla Shamo's cousins and their families, and a number of these family members are still missing. As a result of the invasion, Plaintiff Heivi Khalaf developed depression. Since the attack, Plaintiff Basel Shamo has suffered from nightmares and depression, and has been unable to work.

1890. ISIS looted and destroyed Plaintiffs Heivi Khalaf, Baseh Shamo, Bassemah Shamo, Bannaz Shamo, Roza Shamo, Basel Shamo, and Layla Shamo's real and personal property.



1891. As a result of ISIS's invasion, Plaintiffs Heivi Khalaf, Baseh Shamo, Bassemah Shamo, Bannaz Shamo, Roza Shamo, Basel Shamo, and Layla Shamo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Darweesh Qasim and Kori Omar**

1892. Plaintiffs Darweesh Qasim and Kori Omar are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Darweesh Qasim and Plaintiff Kori Omar are married.

1893. Plaintiffs Darweesh Qasim and Kori Omar have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1894. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Darweesh Qasim and Kori Omar fled to Sinjar Mountain with their children, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Darweesh Qasim and Kori Omar's two-month-old baby died on Sinjar Mountain. Plaintiff Darweesh Qasim's father fled to the mountain with them, but returned to their village, where he died from a heart attack after seeing the destruction. Plaintiff Kori Omar's sister was killed by ISIS as she was fleeing. ISIS captured Plaintiffs Darweesh Qasim and Kori Omar's nephews and niece. Their nephews escaped, but their niece is still missing.

1895. ISIS looted and destroyed Plaintiffs Darweesh Qasim and Kori Omar's real and personal property.

1896. As a result of ISIS's invasion, Plaintiffs Darweesh Qasim and Kori Omar have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khairi Alsattam, Lozina Alkhalaf, S.A., M.A., A.A., and N.A.**

1897. Plaintiffs Khairi Alsattam, Lozina Alkhalaf, S.A., M.A., A.A., and N.A. are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Khairi Alsattam and Lozina Alkhalaf are married. Plaintiffs S.A., M.A., A.A., and N.A. are the children of Plaintiffs Khairi Alsattam and Lozina Alkhalaf.

1898. Plaintiffs Khairi Alsattam, Lozina Alkhalaf, S.A., M.A., A.A., and N.A. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1899. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khairi Alsattam, Lozina Alkhalaf, S.A., M.A., A.A., and N.A. and Plaintiff Khairi Alsattam's siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. ISIS killed Plaintiff Khairi Alsattam's uncle and cousin. Plaintiff Lozina Alkhalaf's father, uncles, and cousins who lived in another village were killed by ISIS when they were trying to defend their village. Plaintiff Lozina Alkhalaf's mother and sisters escaped to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Lozina Alkhalaf's sister suffered a mental breakdown as a result of the invasion and is now unable to recognize Plaintiff Lozina Alkhalaf and her other family members.

1900. ISIS looted and destroyed Plaintiffs Khairi Alsattam, Lozina Alkhalaf, S.A., M.A., A.A., and N.A.'s real and personal property.

1901. As a result of ISIS's invasion, Plaintiffs Khairi Alsattam, Lozina Alkhalaf, S.A., M.A., A.A., and N.A. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Kasim Hamo**

1902. Plaintiff Kasim Hamo is a citizen of the United States and domiciled in the state of Nebraska.

1903. Plaintiff Kasim Hamo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1904. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Kasim Hamo's family, including his parents and siblings, fled to Kurdistan. Plaintiff Kasim Hamo fearfully followed his family's journey as they fled. ISIS killed Plaintiff Kasim Hamo's uncle, and uploaded a video on YouTube of him being tortured prior to his death.

1905. ISIS looted and destroyed Plaintiff Kasim Hamo's real and personal property.

1906. As a result of ISIS's invasion, Plaintiff Kasim Hamo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Inas Al Aode**

1907. Plaintiff Inas Al Aode is a citizen of the United States and domiciled in the state of Nebraska.

1908. Plaintiff Inas Al Aode has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1909. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Inas Al Aode's family, including her parents and siblings, fled to Kurdistan. Plaintiff Inas Al Aode fearfully followed her family's journey as they fled. Since the invasion, Plaintiff Inas Al Aode has gone to therapy and taken medication from the distress caused by the invasion.

1910. ISIS looted and destroyed Plaintiff Inas Al Aode's real and personal property.

1911. As a result of ISIS's invasion, Plaintiff Inas Al Aode has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Khaleel Samo and David Khaleel**

1912. Plaintiffs Khaleel Samo and David Khaleel are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Khaleel Samo is the father of Plaintiff David Khaleel.

1913. Plaintiffs Khaleel Samo and David Khaleel have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1914. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khaleel Samo fled to Sinjar Mountain with his wife, children, and siblings, where they were trapped until they were able to escape to Kurdistan. Plaintiff David Khaleel fearfully followed his family's journey as they fled. ISIS killed Plaintiff Khaleel Samo's nephew while he was fetching food and water from the villages to give to family members on the mountain.

1915. ISIS looted and destroyed Plaintiffs Khaleel Samo and David Khaleel's real and personal property.

1916. As a result of ISIS's invasion, Plaintiffs Khaleel Samo and David Khaleel have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Suriyah Haji**

1917. Plaintiff Suriyah Haji is a citizen of the United States and domiciled in the state of Nebraska.

1918. Plaintiff Suriyah Haji has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1919. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Suriyah Haji fled to Sinjar Mountain with her siblings, where she was trapped until she managed to escape to Kurdistan. Plaintiff Suriyah Haji's father had a stroke while fleeing, and

her 12-year-old brother had a heart attack. ISIS killed Plaintiff Suriyah Haji's grandparents and two uncles, and her aunts died in a car crash while fleeing from ISIS.

1920. ISIS looted and destroyed Plaintiff Suriyah Haji's real and personal property.

1921. As a result of ISIS's invasion, Plaintiff Suriyah Haji has experienced economic loss, severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Kheder Kheder**

1922. Plaintiff Kheder Kheder is a citizen of the United States and domiciled in the state of Nebraska.

1923. Plaintiff Kheder Kheder has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1924. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Kheder Kheder's family, including his uncles and their children, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Kheder Kheder fearfully followed his family's journey as they fled.

1925. ISIS looted and destroyed Plaintiff Kheder Kheder's real and personal property.

1926. As a result of ISIS's invasion, Plaintiff Kheder Kheder has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Meser Haje, Savey Khro, A.K., Ay.M.K., and Al.M.K.**

1927. Plaintiffs Meser Haje, Savey Khro, A.K., Ay.M.K., and Al.M.K. are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Meser Haje and Savey Khro are married, and Plaintiffs A.K., Ay.M.K., and A.Ml.K. are their children.

1928. Plaintiffs Meser Haje, Savey Khro, A.K., Ay.M.K., and Al.M.K. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1929. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Meser Haje, Savey Khro, A.K., Ay.M.K., and Al.M.K. fled to Kurdistan with some of Plaintiff Meser Haje's siblings and their families. ISIS captured Plaintiff Meser Haje's cousin and his family. Plaintiff Meser Haje's cousin was later released but then died as a result of a heart attack. One of Plaintiff Meser Haje's cousin's children was also released but the rest of the family is still missing. Plaintiffs Meser Haje and Savey Khro developed several health problems following the invasion. Plaintiff Savey Khro now suffers from post-traumatic stress disorder following the invasion.

1930. ISIS looted and destroyed Plaintiffs Meser Haje, Savey Khro, A.K., Ay.M.K., and Al.M.K.'s real and personal property.

1931. As a result of ISIS's invasion, Plaintiffs Meser Haje, Savey Khro, A.K., Ay.M.K., and Al.M.K. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Husayn Joko and Sarah Joko**

1932. Plaintiffs Husayn Joko and Sarah Joko are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Husayn Joko and Plaintiff Sarah Joko are married.

1933. Plaintiffs Husayn Joko and Sarah Joko have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1934. In particular, on or about August 1, 2014, fearing that ISIS could come to Sinjar and concerned that Plaintiff Husayn Joko would be targeted, Plaintiffs Husayn Joko and Sarah Joko fled to Kurdistan and then Erbil. On August 3, 2014, in response to ISIS's invasion of Sinjar,

Iraq, Plaintiff Husayn Joko's family, including his siblings, and Plaintiff Sarah Joko's family, including her parents, siblings, and their families, fled to Kurdistan. Plaintiffs Husayn Joko and Sarah Joko fearfully followed their families' journeys as they fled. ISIS captured Plaintiff Sarah Joko's cousin. Plaintiff Sarah Joko's father suffered from mental health issues following the invasion and died at a temporary camp for internally displaced persons. ISIS captured Plaintiff Sarah Joko's cousin.

1935. ISIS looted and destroyed Plaintiffs Husayn Joko and Sarah Joko's real and personal property.

1936. As a result of ISIS's invasion, Plaintiffs Husayn Joko and Sarah Joko have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ikhelas Mirza**

1937. Plaintiff Ikhelas Mirza is a citizen of the United States and domiciled in the state of Nebraska.

1938. Plaintiff Ikhelas Mirza has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1939. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ikhelas Mirza fled with her husband and children, first to Erbil, and then to Jordan. Plaintiff Ikhelas Mirza's niece was captured by ISIS, along with her children, and taken to Raqqa. Her niece was in captivity for approximately 5 years until she was able to escape with some of her children, though others remained behind. Plaintiff Ikhelas Mirza now sees a psychologist regularly.

1940. ISIS looted and destroyed Plaintiff Ikhelas Mirza's real and personal property.

1941. As a result of ISIS's invasion, Plaintiff Ikhelas Mirza has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Jameel Darweesh**

1942. Plaintiff Jameel Darweesh is a citizen of the United States and domiciled in the state of Nebraska.

1943. Plaintiff Jameel Darweesh has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1944. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Jameel Darweesh's family, including his brother and mother fled to Kurdistan. Plaintiff Jameel Darweesh and his wife were already in Kurdistan at the time of the invasion. Plaintiff Jameel Darweesh fearfully followed his family's journey as they fled.

1945. ISIS looted destroyed Plaintiff Jameel Darweesh's real and personal property.

1946. As a result of ISIS's invasion, Plaintiff Jameel Darweesh has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Khairi Darweesh**

1947. Plaintiff Khairi Darweesh is a citizen of the United States and domiciled in the state of California.

1948. Plaintiff Khairi Darweesh has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1949. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khairi Darweesh's family, including his mother and siblings, fled to Kurdistan.



Plaintiff Khairi Darweesh fearfully followed his family's journey as they fled. Following the invasion Plaintiff Khairi worked overtime to support his family. Since the invasion Plaintiff Khairi suffers from mental health issues.

1950. ISIS looted and destroyed Plaintiff Khairi Darweesh's real and personal property.

1951. As a result of ISIS's invasion, Plaintiff Khairi Darweesh has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Fares Dahhar**

1952. Plaintiff Fares Dahhar is a citizen of the United States and domiciled in the state of Nebraska.

1953. Plaintiff Fares Dahhar has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1954. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Fares Dahhar's family, including his sisters and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Fares Dahhar fearfully followed his family's journey as they fled. Plaintiff Fares Dahhar now suffers from diabetes following the invasion.

1955. ISIS looted and destroyed Plaintiff Fares Dahhar's real and personal property.

1956. As a result of ISIS's invasion, Plaintiff Fares Dahhar has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Halimah Hasan**

1957. Plaintiff Halimah Hasan is a citizen of the United States and domiciled in the state of Nebraska.

1958. Plaintiff Halimah Hasan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1959. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Halimah Hasan's family, including her father, grandfather, aunts, uncles and cousins all fled ISIS. Plaintiff Halimah Hasan's father fled directly to Kurdistan, whereas her grandfather, some uncles, and some aunts fled first to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Halimah Hasan fearfully followed her family's journey as they fled.

1960. ISIS looted and destroyed Plaintiff Halimah Hasan's real and personal property.

1961. As a result of ISIS's invasion, Plaintiff Halimah Hasan's has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Mohsin Haji and Nofa Kasem**

1962. Plaintiffs Mohsin Haji and Nofa Kasem are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Mohsin Haji and Plaintiff Nofa Kasem are married.

1963. Plaintiffs Mohsin Haji and Nofa Kasem have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1964. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Mohsin Haji's family, including his parents, siblings, and their families, and Plaintiff Nofa Kasem's family, including her sister, uncles, aunts, and their families, fled to Kurdistan. Some of Plaintiff Mohsin Haji's uncles fled to Sinjar Mountain, where they were trapped until

they were able to escape to Kurdistan. Plaintiffs Mohsin Haji and Nofa Kasem fearfully followed their families' journeys as they fled. Plaintiff Mohsin Haji's younger sister went missing for almost two weeks during the escape. Plaintiff Nofa Kasem's aunt and her family were trapped in their house by ISIS for a month.

1965. ISIS looted and destroyed Plaintiffs Mohsin Haji's and Nofa Kasem's real and personal property.

1966. As a result of ISIS's invasion, Plaintiffs Mohsin Haji and Nofa Kasem have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Salim Kheder and Sameera Rasho**

1967. Plaintiffs Salim Kheder and Sameera Rasho are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Salim Kheder and Sameera Rasho are married.

1968. Plaintiffs Salim Kheder and Sameera Rasho have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1969. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sameera Rasho fled with her children to Kurdistan. Plaintiff Salim Kheder, who has a disability, was initially forced to stay behind, and was almost captured by ISIS. He eventually managed to also flee to Kurdistan, and was only able to reunite with his family after a few weeks.

1970. ISIS looted and destroyed Plaintiffs Salim Kheder and Sameera Rasho's real and personal property.

1971. As a result of ISIS's invasion, Plaintiffs Salim Kheder and Sameera Rasho have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Sharro Gebbo**

1972. Plaintiff Sharro Gebbo is a citizen of the United States and domiciled in the state of Nebraska.

1973. Plaintiff Sharro Gebbo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1974. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sharro Gebbo's family, including his uncles, cousins, and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Sharro Gebbo fearfully followed his family's journey as they fled. ISIS captured Plaintiff Sharro Gebbo's cousins and their families. One cousin escaped after four months, and another cousin was released by ISIS. ISIS physically tortured Plaintiff Sharro Gebbo's niece. Plaintiff Sharro Gebbo's niece escaped but later committed suicide.

1975. ISIS looted and destroyed Plaintiff Sharro Gebbo's real and personal property.

1976. As a result of ISIS's invasion, Plaintiff Sharro Gebbo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Faisal Rasho**

1977. Plaintiff Faisal Rasho is a citizen of the United States and domiciled in the state of Washington.

1978. Plaintiff Faisal Rasho has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1979. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Faisal Rasho's family, including his father, siblings, their families, and Plaintiff Faisal Rasho's wife's family, fled to Sinjar Mountain where they were trapped until they were able

to escape to Kurdistan. Plaintiff Faisal Rasho fearfully followed his family's journey as they fled. As a result of the invasion, Plaintiff Faisal Rasho was unable to continue with his employment.

1980. ISIS looted and destroyed Plaintiff Faisal Rasho's real and personal property.

1981. As a result of ISIS's invasion, Plaintiff Faisal Rasho has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hasso Bakr**

1982. Plaintiff Hasso Bakr is a citizen of the United States and domiciled in the state of Nebraska.

1983. Plaintiff Hasso Bakr has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1984. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hasso Bakr's family, including his wife, children (including a four-month-old infant), mother, and brothers and their families fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hasso Bakr fearfully followed his family's journey as they fled. Some of Plaintiff Hasso Bakr's children were separated from their mother and fled to the mountain separately. Plaintiff Hasso Bakr was unable to work during this period. Plaintiff Hasso Bakr's wife now suffers from extreme trauma following the invasion.

1985. ISIS looted and destroyed Plaintiff Hasso Bakr's real and personal property.

1986. As a result of ISIS's invasion, Plaintiff Hasso Bakr has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Bizi Misqri**

1987. Plaintiff Bizi Misqri is a citizen of the United States and domiciled in the state of Nebraska.

1988. Plaintiff Bizi Misqri has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1989. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Bizi Misqri fled to Sinjar Mountain with her husband, children, siblings, cousins, aunts, and uncles, where they were trapped until they were able to escape to Kurdistan. While fleeing, forty-three members of Plaintiff Bizi Misqri's family were captured, including her father, nephew, and aunts. Plaintiff Bizi Misqri's father and other members of the family were killed by ISIS as they tried to escape from captivity. ISIS looted and destroyed Plaintiff Bizi Misqri's real and personal property. As a result of ISIS's invasion, Plaintiff Bizi Misqri has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Haroon Al Hayder**

1990. Plaintiff Haroon Al Hayder is a citizen of the United States and domiciled in the state of Nebraska.

1991. Plaintiff Haroon Al Hayder has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1992. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Haroon Al Hayder's family including his grandmother, fled to Kurdistan. Plaintiff Haroon Al Hayder was in Kurdistan at the time of the invasion with his immediate family members, and fearfully followed his family's journey as they fled. As ISIS approached closer to his home in Kurdistan, Plaintiff Haroon Al Hayder and his family fled further north. Plaintiff

Haroon Al Hayder's young siblings were taken to safety by a cousin, while he and other family members slept in an abandoned school for weeks, until they were able to return home. Plaintiff Haroon Al Hayder's mother injured her feet as a result of mortar strikes near their home, and has had surgery for these injuries. Plaintiff Haroon Al Hayder continues to suffer from anxiety since the invasion.

1993. As a result of ISIS's invasion, Plaintiff Haroon Al Hayder has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hazo Omar**

1994. Plaintiff Hazo Omar is a citizen of the United States and domiciled in the state of Michigan.

1995. Plaintiff Hazo Omar has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

1996. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hazo Omar's family, including his siblings and their families, fled to Kurdistan. Plaintiff Hazo Omar fearfully followed his family's journey as they fled. ISIS killed Plaintiff Hazo Omar's nephew. Plaintiff Hazo Omar's niece later committed suicide by setting herself on fire. Plaintiff Hazo Omar's sister was injured while fleeing from Sinjar and is now unable to walk without assistance.

1997. ISIS looted and destroyed Plaintiff Hazo Omar's real and personal property.

1998. As a result of ISIS's invasion, Plaintiff Hazo Omar has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Imad Matto**

1999. Plaintiff Imad Matto is a citizen of the United States and domiciled in the state of Texas.

2000. Plaintiff Imad Matto has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2001. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Imad Matto's family, including his parents, siblings, and their families, fled to Kurdistan. Plaintiff Imad Matto's uncle and his family fled to Sinjar Mountain, where they were trapped until they were able to flee to Kurdistan. Plaintiff Imad Matto fearfully followed his family's journey as they fled. ISIS killed Plaintiff Imad Matto's uncle while he was trying to find food and clothing for his brother's newborn child. ISIS captured Plaintiff Imad Matto's other uncle, nephew, and three nieces. Plaintiff Imad Matto's three nieces were taken to Syria, where they were subjected to rape in captivity, until they managed to escape. Plaintiff Imad Matto's uncle and nephew are still missing.

2002. ISIS looted and destroyed Plaintiff Imad Matto's real and personal property.

2003. As a result of ISIS's invasion, Plaintiff Imad Matto has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Mahmood Hamo**

2004. Plaintiff Mahmood Hamo is a citizen of the United States and domiciled in the state of Texas.

2005. Plaintiff Mahmood Hamo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.



2006. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, some of Plaintiff Mahmood Hamo's family, including his parents, siblings, and their families, fled to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan. Plaintiff Mahmood Hamo fearfully followed his family's journey as they fled.

2007. ISIS looted and destroyed Plaintiff Mahmood Hamo's real and personal property.

2008. As a result of ISIS's invasion, Plaintiff Mahmood Hamo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Ahmed Hamo**

2009. Plaintiff Ahmed Hamo is a citizen of the United States and domiciled in the state of Texas.

2010. Plaintiff Ahmed Hamo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2011. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, some of Plaintiff Ahmed Hamo's family, including his parents, siblings, and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Others in Plaintiff Ahmed Hamo's family fled directly to Kurdistan. Plaintiff Ahmed Hamo fearfully followed his families' journeys as they fled.

2012. ISIS looted and destroyed Plaintiff Ahmed Hamo's real and personal property.

2013. As a result of ISIS's invasion, Plaintiff Ahmed Hamo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Marenah Khalaf**

2014. Plaintiff Marenah Khalaf is a citizen of the United States and domiciled in the state of Texas.

2015. Plaintiff Marenah Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2016. In particular, on or about August 3, 2014, in response to ISIS's invasion Sinjar, Iraq, Plaintiff Marenah Khalaf's family, including her parents and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Marenah Khalaf fearfully followed her family's journey as they fled.

2017. ISIS looted and destroyed Plaintiff Marenah Khalaf's real and personal property.

2018. As a result of ISIS's invasion, Plaintiff Marenah Khalaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Wlid Qaro**

2019. Plaintiff Wlid Qaro is a citizen of the United States and domiciled in the state of Texas.

2020. Plaintiff Wlid Qaro has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2021. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Wlid Qaro's mother, siblings, and their families fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Wlid Qaro fearfully followed his family's journey as they fled. ISIS captured Plaintiff Wlid Qaro's cousin and her family and killed Plaintiff Wlid Qaro's cousin's husband and son. ISIS also captured another of Plaintiff Wlid Qaro's cousins.

2022. ISIS looted and destroyed Plaintiff Wlid Qaro's real and personal property.

2023. As a result of ISIS's invasion, Plaintiff Wlid Qaro has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property and/or loss of his family's society and counsel.

**Alias Aldakhi**

2024. Plaintiff Alias Aldakhi is a citizen of the United States and domiciled in the state of New York.

2025. Plaintiff Alias Aldakhi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2026. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Alias Aldakhi's mother, sisters, and cousins fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Alias Aldakhi fearfully followed his family's journey as they fled. ISIS captured Plaintiff Alias Aldakhi's cousin, who was later able to escape.

2027. ISIS looted and destroyed Plaintiff Alias Aldakhi's real and personal property.

2028. As a result of ISIS's invasion, Plaintiff Alias Aldakhi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property and/or loss of his family's society and counsel.

**Yusra Aldakhi**

2029. Plaintiff Yusra Aldakhi is a citizen of the United States and domiciled in the state of New York.

2030. Plaintiff Yusra Aldakhi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2031. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Yusra Aldakhi's mother and siblings fled to Sinjar Mountain, where they were

trapped until they were able to escape to Kurdistan. Plaintiff Yusra Aldakhi fearfully followed her family's journey as they fled. ISIS captured Plaintiff Yusra Aldakhi's father and brother. ISIS released a video of her brother in captivity. Plaintiff Yusra Aldakhi's father and brother were later released. ISIS captured Plaintiff Yusra Aldakhi's cousin, and he is still missing.

2032. ISIS looted and destroyed Plaintiff Yusra Aldakhi's real and personal property.

2033. As a result of ISIS's invasion, Plaintiff Yusra Aldakhi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Dawood Knjo**

2034. Plaintiff Dawood Knjo is a citizen of the United States and domiciled in the state of Texas.

2035. Plaintiff Dawood Knjo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2036. In particular, on or about August 3, 2014, in response to ISIS's invasion Sinjar, Iraq, Plaintiff Dawood Knjo's family, including his parents, siblings, and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Dawood Knjo fearfully followed his family's journey as they fled. ISIS killed Plaintiff Dawood Knjo's cousins, his grandfather's cousin, and his children, and captured one of the children's wives and their children. ISIS also captured Plaintiff Dawood Knjo's father's aunt and her daughters, two of whom are still in captivity.

2037. ISIS looted and destroyed Plaintiff Dawood Knjo's real and personal property.

2038. As a result of ISIS's invasion, Plaintiff Dawood Knjo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Zinah Muhi**

2039. Plaintiff Zinah Muhi is a citizen of the United States and domiciled in the state of Texas.

2040. Plaintiff Zinah Muhi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2041. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Zinah Muhi's family, including her parents, siblings, and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Zinah Muhi fearfully followed her family's journey as they fled. While on Sinjar Mountain, Plaintiff Zinah Muhi's sister-in-law gave birth, and the baby died before they reached Kurdistan. Plaintiff Zinah Muhi's mother later died in Kurdistan after leaving her medications behind when she fled from ISIS.

2042. ISIS looted and destroyed Plaintiff Zinah Muhi's real and personal property.

2043. As a result of ISIS's invasion, Plaintiff Zinah Muhi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Edo Hammo**

2044. Plaintiff Edo Hammo is a citizen of the United States and domiciled in the state of Texas.

2045. Plaintiff Edo Hammo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2046. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Edo Hammo fled briefly to Sinjar Mountain with his wife, daughter, mother, and some siblings, before going to Kurdistan. Plaintiff Edo Hammo's other siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Edo Hammo's daughter was traumatized by what had happened and died while in the camps for internally displaced persons in Kurdistan. ISIS captured Plaintiff Edo Hammo's uncle, and he is still missing.

2047. ISIS looted and destroyed Plaintiff Edo Hammo's real and personal property.

2048. As a result of ISIS's invasion, Plaintiff Edo Hammo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Ismael Hammo**

2049. Plaintiff Ismael Hammo is a citizen of the United States and domiciled in the state of Texas.

2050. Plaintiff Ismael Hammo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2051. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ismael Hammo's family, including some of his siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Ismael Hammo fearfully followed his family's journey as they fled. Plaintiff Ismael Hammo's niece died in the camps for internally displaced persons. ISIS captured Plaintiff Ismael Hammo's uncle, who is still missing.

2052. ISIS looted and destroyed Plaintiff Ismael Hammo's real and personal property.

2053. As a result of ISIS's invasion, Plaintiff Ismael Hammo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property, and/or loss of his family's society and counsel.

**Firas Arab and Shahrazad Jumaah**

2054. Plaintiffs Firas Arab and Shahrazad Jumaah are citizens of the United States and domiciled in the state of Washington. Plaintiffs Firas Arab and Shahrazad Jumaah are married.

2055. Plaintiffs Firas Arab and Shahrazad Jumaah have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2056. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Firas Arab and Shahrazad Jumaah's families, including their parents and siblings, fled to Kurdistan. Plaintiffs Firas Arab and Shahrazad Jumaah fearfully followed their family's journey as they fled.

2057. ISIS looted and destroyed Plaintiffs Firas Arab and Shahrazad Jumaah's real and personal property.

2058. As a result of ISIS's invasion, Plaintiffs Firas Arab and Shahrazad Jumaah have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Nofa Dena, Banas Dna, and Rojgar Dna**

2059. Plaintiffs Nofa Dena, Banas Dna, and Rojgar Dna are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Nofa Dena is Plaintiff Banas Dna and Rojgar Dna's mother.

2060. Plaintiffs Nofa Dena, Banas Dna, and Rojgar Dna have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2061. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nofa Dena's siblings fled to Turkey. Plaintiff Nofa Dena's daughter and son-in-law (Plaintiff Banas Dna and Rojgar Dna's sister and brother-in-law) were doctors and travelled from Kurdistan to Sinjar Mountain to offer medical assistance to other Yazidis. Plaintiffs Nofa Dena, Banas Dna and Rojgar Dna's extended family members also fled their homes because of ISIS. Plaintiffs Nofa Dena, Banas Dna, and Rojgar Dna fearfully followed their family's journey as they fled.

2062. As a result of ISIS's invasion, Plaintiffs Nofa Dena, Banas Dna, and Rojgar Dna have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Bakir Murad and Paiman Dna**

2063. Plaintiffs Bakir Murad and Paiman Dna are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Bakir Murad and Plaintiff Paiman Dna are married.

2064. Plaintiffs Bakir Murad and Paiman Dna have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2065. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Bakir Murad's mother, brothers, and their families fled to Kurdistan and Plaintiff Paiman Dna's family fled to Turkey. Plaintiffs Bakir Murad and Paiman Dna fearfully followed their families' journeys as they fled. Plaintiff Bakir Murad was in Kurdistan during the invasion and joined his family once they arrived there. Plaintiff Paiman Dna's sister, who was a doctor, travelled to Sinjar from Kurdistan to provide medical assistance following the invasion. ISIS captured Plaintiff Paiman Dna's cousin, but she was able to escape after one day.



2066. As a result of ISIS's invasion, Plaintiffs Bakir Murad and Paiman Dna have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Daran Khamo**

2067. Plaintiff Daran Khamo is a citizen of the United States and domiciled in the state of Texas.

2068. Plaintiff Daran Khamo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2069. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Daran Khamo fled to the Turkish border with his family, including his parents, siblings, uncles, cousins, and their families. As a result of ISIS's invasion, Plaintiff Daran Khamo suffered from panic attacks.

2070. As a result of ISIS's invasion, Plaintiff Daran Khamo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Rashid Murad**

2071. Plaintiff Rashid Murad is a citizen of the United States and domiciled in the state of Texas.

2072. Plaintiff Rashid Murad has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2073. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Rashid Murad fled to Zakho with his wife, children, parents, siblings, and their families.

2074. As a result of ISIS's invasion, Plaintiff Rashid Murad has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Alan Murad**

2075. Plaintiff Alan Murad is a citizen of the United States and domiciled in the state of Texas.

2076. Plaintiff Alan Murad has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2077. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Alan Murad's family, including his wife and her family, his mother, siblings, grandparents, uncles, and their families fled to northern Kurdistan. Plaintiff Alan Murad fearfully followed his family's journey as they fled. During the escape, Plaintiff Alan Murad's grandmother suffered from limited mobility and was unable to walk. Plaintiff Alan Murad's grandfather suffered a stroke soon after the invasion. Due to the invasion, Plaintiff Alan Murad's wife suffered from anxiety for which she sought medical treatment.

2078. As a result of ISIS's invasion, Plaintiff Alan Murad has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Evan Bibo and Shahnaz Murad**

2079. Plaintiffs Evan Bibo and Shahnaz Murad are citizens of the United States and domiciled in the state of Texas. Plaintiffs Evan Bibo and Shahnaz Murad are married.

2080. Plaintiffs Evan Bibo and Shahnaz Murad have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2081. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Evan Bibo and Shahnaz Murad fled to northern Kurdistan with Plaintiff Evan Bibo's parents and siblings, and Plaintiff Shahnaz Murad's parents, siblings, grandparents, uncles and their families.

2082. As a result of ISIS's invasion, Plaintiffs Evan Bibo and Shahnaz Murad have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Kawa Murad, Hanaa Darwish, and Jolyana Khammoo**

2083. Plaintiffs Kawa Murad, Hanaa Darwish, and Jolyana Khammoo are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Kawa Murad and Hanaa Darwish are married. Plaintiff Jolyana Khammoo is their daughter.

2084. Plaintiffs Kawa Murad, Hanaa Darwish, and Jolyana Khammoo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2085. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Kawa Murad, Hanaa Darwish, and Jolyana Khammoo fled to Zakho, along with their other family members. Since the invasion, Plaintiff Jolyana Khammoo has continued to suffer from anxiety.

2086. As a result of ISIS's invasion, Plaintiffs Kawa Murad, Hanaa Darwish, and Jolyana Khammoo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Alyas Saydo**

2087. Plaintiff Alyas Saydo is a citizen of the United States and domiciled in the state of Washington.

2088. Plaintiff Alyas Saydo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2089. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Alyas Saydo's family, including his mother, siblings, and their families, fled to Kurdistan. Plaintiff Alyas Saydo fearfully followed his family's journey as they fled. After his family relocated in an unfinished school in Kurdistan, Plaintiff Alyas Saydo visited them from the United States and stayed with them for almost two weeks.

2090. ISIS looted and destroyed Plaintiff Alyas Saydo's real and personal property.

2091. As a result of ISIS's invasion, Plaintiff Alyas Saydo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Najma Khalaf**

2092. Plaintiff Najma Khalaf is a citizen of the United States and domiciled in the state of New York.

2093. Plaintiff Najma Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2094. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Najma Khalaf's family, including her parents and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Najma Khalaf fearfully followed her family's journey as they fled. ISIS shot Plaintiff Najma Khalaf's brother in the knee as he ran to the mountain. Following the invasion, Plaintiff Najma Khalaf's father has suffered two heart attacks, her mother was diagnosed with a high blood pressure, and her son was diagnosed with depression and placed in a special education program.

2095. ISIS looted and destroyed Plaintiff Najma Khalaf's real and personal property.

2096. As a result of ISIS's invasion, Plaintiff Najma Khalaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Jallal Isa**

2097. Plaintiff Jallal Isa is a citizen of the United States and domiciled in the state of Texas.

2098. Plaintiff Jallal Isa has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2099. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Jallal Isa's parents, siblings, and their families fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Jallal Isa fearfully followed his family's journey as they fled.

2100. ISIS looted and destroyed Plaintiff Jallal Isa's real and personal property.

2101. As a result of ISIS's invasion, Plaintiff Jallal Isa has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Nibras Basitkey**

2102. Plaintiff Nibras Basitkey is a citizen of the United States and domiciled in the state of Nebraska.

2103. Plaintiff Nibras Basitkey has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2104. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nibras Basitkey fled to Kurdistan with her parents and siblings. As a result, Plaintiff

Nibras Basitkey had to restart high school, going from almost a senior to a freshman once she came to America.

2105. ISIS looted and destroyed Plaintiff Nibras Basitkey's real and personal property.

2106. As a result of ISIS's invasion, Plaintiff Nibras Basitkey has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Farhan Alyas**

2107. Plaintiff Farhan Alyas is a citizen of the United States and domiciled in the state of Michigan.

2108. Plaintiff Farhan Alyas has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2109. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Farhan Alyas's family, including his father, step-mother, and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Farhan Alyas fearfully followed his family's journey as they fled.

2110. ISIS looted and destroyed Plaintiff Farhan Alyas's real and personal property.

2111. As a result of ISIS's invasion, Plaintiff Farhan Alyas has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**John Zalfow**

2112. Plaintiff John Zalfow is a citizen of the United States and domiciled in the state of Texas.

2113. Plaintiff John Zalfow has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2114. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff John Zalfow's parents, brothers, sisters, and their families fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff John Zalfow fearfully followed his family's journey as they fled. Plaintiff John Zalfow was diagnosed with post-traumatic stress disorder following the invasion.

2115. ISIS looted and destroyed Plaintiff John Zalfow's real and personal property.

2116. As a result of ISIS's invasion, Plaintiff John Zalfow has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Khalid Haider**

2117. Plaintiff Khalid Haider is a citizen of the United States and domiciled in the state of Virginia.

2118. Plaintiff Khalid Haider has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2119. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khalid Haider's parents, siblings, and sister-in-law fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Khalid Haider fearfully followed his family's journey as they fled. ISIS threw grenades and shot at Plaintiff Khalid Haider's family as they fled to the mountain.

2120. ISIS looted and destroyed Plaintiff Khalid Haider's real and personal property.

2121. As a result of ISIS's invasion, Plaintiff Khalid Haider has experienced severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hazim Avdal**

2122. Plaintiff Hazim Avdal is a citizen of the United States and domiciled in the state of Ohio.

2123. Plaintiff Hazim Avdal has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2124. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hazim Avdal's mother, grandmother, siblings, and uncle fled to Kurdistan. Plaintiff Hazim Avdal's maternal grandmother and uncles fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hazim Avdal fearfully followed his family's journey as they fled. Plaintiff Hazim Avdal and one of his brothers were already in Kurdistan at the time, and they met their family members there. Plaintiff Hazim Avdal and his family then traveled to Turkey where they stayed in refugee camps. Plaintiff Hazim Avdal spent approximately five months in the camps, whereas his family was there for over a year.

2125. ISIS looted and destroyed Plaintiff Hazim Avdal's real and personal property.

2126. As a result of ISIS's invasion, Plaintiff Hazim Avdal has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Saad Ibrahim**

2127. Plaintiff Saad Ibrahim is a citizen of the United States and domiciled in the state of Nebraska.

2128. Plaintiff Saad Ibrahim has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.



2129. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saad Ibrahim's brothers and sisters fled to Kurdistan. Plaintiff Saad Ibrahim fearfully followed his family's journey as they fled.

2130. ISIS looted and destroyed Plaintiff Saad Ibrahim's real and personal property.

2131. As a result of ISIS's invasion, Plaintiff Saad Ibrahim has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Ibrahim Khilla**

2132. Plaintiff Ibrahim Khilla is a citizen of the United States and domiciled in the state of Washington.

2133. Plaintiff Ibrahim Khilla has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2134. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq Plaintiff Ibrahim Khilla's family, including his mother, siblings, and their families, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Ibrahim Khilla fearfully followed his family's journey as they fled.

2135. ISIS looted and destroyed Plaintiff Ibrahim Khilla's real and personal property.

2136. As a result of ISIS's invasion, Plaintiff Ibrahim Khilla has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Azzat Aldake**

2137. Plaintiff Azzat Aldake is a citizen of the United States and domiciled in the state of Nebraska.

2138. Plaintiff Azzat Aldake has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2139. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq Plaintiff Azzat Aldake fled to Kurdistan with his wife, children, mother, and brother. ISIS captured Plaintiff Azzat Aldake's cousin and her sons, but they later managed to escape. ISIS beheaded Plaintiff Azzat Aldake's grandfather's cousin, who was regarded as the head of Plaintiff Azzat Aldake's tribe. The killing was widely shared across social media platforms.

2140. ISIS looted and destroyed Plaintiff Azzat Aldake real and personal property.

2141. As a result of ISIS's invasion, Plaintiff Azzat Aldake has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Saado Ali and Fatima Ali**

2142. Plaintiffs Saado Ali and Fatima Ali are citizens of the United States and domiciled in the state of Indiana. Plaintiff Saado Ali and Plaintiff Fatima Ali are married.

2143. Plaintiffs Saado Ali and Fatima Ali have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2144. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saado Ali and Plaintiff Fatima Ali, who were not married at the time, fled separately with their families. Plaintiff Saado Ali fled to Kurdistan with his parents, brothers, and their families. Plaintiff Fatima Ali and her sister fled to Sinjar Mountain until they were able to escape to Kurdistan. Plaintiff Fatima Ali's parents and the remainder of her siblings fled directly to Kurdistan.

2145. ISIS looted and destroyed Plaintiffs Saado Ali and Fatima Ali's real and personal property.

2146. As a result of ISIS's invasion, Plaintiffs Saado Ali and Fatima Ali have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property, and/or loss of their family's society and counsel.

**Qassim Chomer and Alifa Khalaf**

2147. Plaintiffs Qassim Chomer and Alifa Khalaf are citizens of the United States and domiciled in the state of Texas. Plaintiffs Qassim Chomer and Alifa Khalaf are married.

2148. Plaintiffs Qassim Chomer and Alifa Khalaf have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2149. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Qassim Chomer's parents, siblings, and sister-in-law fled to Kurdistan. Plaintiff Alifa Khalaf's parents, sister, sister-in-law, and her children fled to Kurdistan. Plaintiffs Qassim Chomer and Alifa Khalaf fearfully followed their family's journey as they fled. When ISIS invaded, Plaintiff Alifa Khalaf's other sister was unable to flee due to her disability. When Plaintiff Alifa Khalaf's family returned for her the next day, she was dead.

2150. ISIS looted and destroyed Plaintiffs Qassim Chomer and Alifa Khalaf's real and personal property.

2151. As a result of ISIS's invasion, Plaintiffs Qassim Chomer and Alifa Khalaf have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khudayda Aldakhi and Fareeda Aldakhi**

2152. Plaintiffs Khudayda Aldakhi and Fareeda Aldakhi are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Khudayda Aldakhi and Fareeda Aldakhi are married.

2153. Plaintiffs Khudayda Aldakhi and Fareeda Aldakhi have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2154. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khudayda Aldakhi and Fareeda Aldakhi and their children fled to Sinjar Mountain with Plaintiff Fareeda Aldakhi's sister and their nephew, where they were trapped until they were able to escape to Kurdistan. Plaintiff Fareeda Aldakhi and her daughter were burned while fleeing. Plaintiff Khudayda Aldakhi's sister-in-law died while fleeing, and his brother died shortly after.

2155. ISIS looted and destroyed Plaintiffs Khudayda Aldakhi and Fareeda Aldakhi's real and personal property.

2156. As a result of ISIS's invasion, Plaintiffs Khudayda Aldakhi and Fareeda Aldakhi have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Suaad Shammo, Khalaf Shammo, Ibrahim Oso, and Kamo Shammo**

2157. Plaintiffs Ibrahim Oso, Suaad Shammo, Khalaf Shammo, and Kamo Shammo are citizens of the United States and domiciled in the state of Arizona. Plaintiff Ibrahim Oso is Plaintiffs Suaad Shammo, Khalaf Shammo, and Kamo Shammo's father.

2158. Plaintiffs Ibrahim Oso, Suaad Shammo, Khalaf Shammo, and Kamo Shammo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2159. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Suaad Shammo, Khalaf Shammo, and Kamo Shammo's family, including their

grandmother, their sister (Plaintiff Ibrahim Oso's daughter), and her family, fled to Kurdistan, then Turkey. Plaintiffs Ibrahim Oso, Suaad Shammo, Khalaf Shammo, and Kamo Shammo fearfully followed their family's journey as they fled. Plaintiffs Suaad Shammo, Khalaf Shammo, and Kamo Shammo's grandmother died as a result of the journey. Plaintiffs Ibrahim Oso, Suaad Shammo, Khalaf Shammo, and Kamo Shammo now suffer from depression and anxiety following the invasion.

2160. ISIS looted and destroyed Plaintiffs Ibrahim Oso, Suaad Shammo, Khalaf Shammo, and Kamo Shammo's real and personal property.

2161. As a result of ISIS's invasion, Plaintiffs Ibrahim Oso, Suaad Shammo, Khalaf Shammo, and Kamo Shammo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Barack Abraham**

2162. Plaintiff Barack Abraham is a citizen of the United States and domiciled in the state of Arizona.

2163. Plaintiff Barack Abraham has suffered severe injuries as a result of ISIS's campaign targeting Yazidis in Iraq.

2164. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Barack Abraham's family, including his grandmother, uncles, and cousins, fled to Kurdistan, then Turkey. Plaintiff Barack Abraham fearfully followed his family's journey as they fled. Plaintiff Barack Abraham's grandmother died while fleeing. Plaintiff Barack Abraham now suffers from psychological issues following the invasion, for which he is receiving ongoing medical care.

2165. ISIS looted and destroyed Plaintiff Barack Abraham's real and personal property.

2166. As a result of ISIS's invasion, Plaintiff Barack Abraham has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Basima Auso and Faris Auso**

2167. Plaintiffs Basima Auso and Faris Auso are citizens of the United States and domiciled in the state of Washington. Plaintiff Basima Auso and Plaintiff Faris Auso are married.

2168. Plaintiffs Basima Auso and Faris Auso have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2169. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Basima and Faris Auso fled with their child and Plaintiff Faris Auso's parents, brothers and sisters to Kurdistan. ISIS shot at their car while fleeing. ISIS captured and killed Plaintiff Faris Auso's cousins. ISIS captured Plaintiff Basima Auso's uncle, aunt, and their family, and they are all still missing.

2170. ISIS looted and destroyed Plaintiffs Basima Auso and Faris Auso's real and personal property.

2171. As a result of ISIS's invasion, Plaintiffs Basima Auso and Faris Auso have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Barakat Aslan**

2172. Plaintiff Barakat Aslan is a citizen of the United States and domiciled in the state of Nebraska.

2173. Plaintiff Barakat Aslan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting the Yazidis.

2174. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Barakat Aslan's siblings and their families fled to Kurdistan. Plaintiff Barakat Aslan fearfully followed his family's journey as they fled. Plaintiff Barakat Aslan's aunt was unable to flee from ISIS due to a disability, and was killed.

2175. ISIS looted and destroyed Plaintiff Barakat Aslan's real and personal property.

2176. As a result of ISIS's invasion, Plaintiffs Barakat Aslan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Alan Ibrahim and Amscha Ali**

2177. Plaintiffs Alan Ibrahim and Amscha Ali are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Alan Ibrahim and Amscha Ali are married.

2178. Plaintiffs Alan Ibrahim and Amscha Ali have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2179. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Amscha Ali fled to Sinjar Mountain with her mother and siblings, where they were trapped until they were able to escape to Kurdistan. Plaintiff Amscha Ali's niece died of dehydration on Sinjar Mountain. Plaintiff Amscha Ali's father and other brothers stayed to fight ISIS, until they were later able to join the family in Kurdistan. ISIS captured Plaintiff Amscha Ali's cousin and her daughter, and the daughter is still missing.

2180. Plaintiffs Alan Ibrahim and Amscha Ali have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel. Alan Ibrahim's mother, siblings, and their families fled to Kurdistan.

Plaintiff Alan Ibrahim fearfully followed his family's journey as they fled. ISIS captured Plaintiff Alan Ibrahim's cousin and his family, and members of this family are still missing.

2181. ISIS looted and destroyed Plaintiff Alan Ibrahim and Plaintiff Amshsa Ali's real and personal property.

2182. As a result of ISIS's invasion

**Navin Naif**

2183. Plaintiff Navin Naif is a citizen of the United States and domiciled in the state of Nebraska.

2184. Plaintiff Navin Naif has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2185. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Navin Naif fled to Kurdistan with her parents and siblings.

2186. ISIS looted and destroyed Plaintiff Navin Naif's real and personal property.

2187. As a result of ISIS's invasion, Plaintiff Navin Naif has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Kouli Khalaf**

2188. Plaintiff Kouli Khalaf is a citizen of the United States and domiciled in the state of Virginia.

2189. Plaintiff Kouli Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2190. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Kouli Khalaf's mother and brothers and their families fled to Sinjar Mountain, where



they were trapped until they were able to escape to Kurdistan. While they were travelling to Sinjar Mountain, one of the cars being used by Plaintiff Kouli Khalaf's mother and brother was briefly captured by ISIS before being released. ISIS shot at another car in which Plaintiff Kouli Khalaf's other brother and niece were fleeing, and her niece was injured. ISIS shot at and severely injured one of Plaintiff Kouli Khalaf's nephews.

2191. ISIS looted and destroyed Plaintiff Kouli Khalaf's real and personal property.

2192. As a result of ISIS's invasion, Plaintiff Kouli Khalaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Shiri Khalaf**

2193. Plaintiff Shiri Khalaf is a citizen of the United States and domiciled in the state of Virginia.

2194. Plaintiff Shiri Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2195. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Shiri Khalaf's daughter, grandchildren, and sisters fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Shiri Khalaf fearfully followed her family's journey as they fled.

2196. As a result of ISIS's invasion, Plaintiff Shiri Elias Khalaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Ismail Heskan and Ilham Alijomir**

2197. Plaintiffs Ismail Heskan and Ilham Alijomir are citizens of the United States and domiciled in the state of Ohio. Plaintiff Ismail Heskan and Plaintiff Ilham Alijomir are married.

2198. Plaintiffs Ismail Heskan and Ilham Alijomir have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2199. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq Plaintiff Ilham Alijomir fled to Kurdistan, and then to Turkey, with Plaintiff Ismail Heskan's family. Plaintiff Ismail Heskan fearfully followed his family's journey as they fled. ISIS shot and threw grenades at Plaintiff Ilham Alijomir's car as she fled.

2200. ISIS looted and destroyed Plaintiffs Ismail Heskan and Ilham Alijomir's real and personal property.

2201. As a result of ISIS's invasion, Plaintiffs Ismail Heskan and Ilham Alijomir have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Tahsin Jihan and Manal Kuly**

2202. Plaintiffs Tahsin Jihan and Manal Kuly are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Tahsin Jihan and Manal Kuly are married.

2203. Plaintiffs Tahsin Jihan and Manal Kuly have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2204. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Tahsin Jihan and Manal Kuly fled to Kurdistan with their child, and Plaintiff Tahsin Jihan's mother and brothers. ISIS killed Plaintiff Tahsin Jihan's cousin. ISIS captured Plaintiff Tahsin Jihan's uncles and their families, but they were later released and fled to Kurdistan. ISIS killed Plaintiff Manal Kuly's cousin, and captured her cousin's family. Plaintiff Manal Kuly's brother fled to Sinjar Mountain, and now suffers from mental health illness.

2205. ISIS looted and destroyed Plaintiffs Tahsin Jihan and Manal Kuly's real and personal property.

2206. As a result of ISIS's invasion, Plaintiffs Tahsin Jihan and Manal Kuly have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Faris Bakr and Zainab Eazden**

2207. Plaintiffs Faris Bakr and Zainab Eazden are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Faris Bakr and Zainab Eazden are married.

2208. Plaintiffs Faris Bakr and Zainab Eazden have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2209. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Faris Bakr and Zainab Eazden's families including their parents and siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Zainab Eazden fearfully followed her family's journey as they fled. One of Plaintiff Faris Bakr's brothers hid from ISIS for ten days in Khana Sor. ISIS killed Plaintiff Faris Bakr's cousin. Plaintiff Faris Bakr's other cousin fell while on Sinjar Mountain and died. Plaintiff Faris Bakr's aunt died while fleeing to Kurdistan. Plaintiff Zainab Eazden's aunt was captured by ISIS but was able to escape. Plaintiff Zainab Eazden's parents developed chronic foot pain while fleeing that still ails them.

2210. ISIS looted and destroyed Plaintiffs Faris Bakr and Zainab Eazden's real and personal property.

2211. As a result of ISIS's invasion, Plaintiffs Faris Bakr and Zainab Eazden have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Hassan Alassaf**

2212. Plaintiff Hassan Alassaf is a citizen of the United States and domiciled in the state of Nebraska.

2213. Plaintiff Hassan Alassaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2214. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hassan Alassaf's mother and siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hassan Alassaf fearfully followed his family's journey as they fled.

2215. ISIS looted and destroyed Plaintiff Hassan Alassaf's real and personal property.

2216. As a result of ISIS's invasion, Plaintiff Hassan Alassaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering, loss of property; and/or loss of his family's society and counsel.

**Riham Jndo**

2217. Plaintiff Riham Jndo is a citizen of the United States and domiciled in the state of Nebraska.

2218. Plaintiff Riham Jndo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2219. In particular, on or about August 3, 2014, in response to ISIS's invasion Sinjar, Iraq, Plaintiff Riham Jndo and her mother and siblings fled to Kurdistan.

2220. ISIS looted and destroyed Plaintiff Riham Jndo's real and personal property.

2221. As a result of ISIS's invasion, Plaintiff Riham Jndo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering, loss of property; and/or loss of her family's society and counsel.

**Maryna Shallal**

2222. Plaintiff Maryna Shallal is a citizen of the United States and domiciled in the state of Nebraska.

2223. Plaintiff Maryna Shallal has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2224. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq Plaintiff Maryna Shallal's family, including her mother and some of her siblings, fled to Kurdistan. Some of Plaintiff Maryna Shallal's sisters fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Maryna Shallal fearfully followed her family's journey as they fled.

2225. ISIS looted and destroyed Plaintiff Maryna Shallal's real and personal property.

2226. As a result of ISIS's invasion, Plaintiff Maryna Shallal has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Sally Rashid and Dalshad Khudhur**

2227. Plaintiffs Sally Rashid and Dalshad Khudhur are citizens of the United States and domiciled in the state of Virginia. Plaintiffs Sally Rashid and Dalshad Khudhur are married.

2228. Plaintiffs Sally Rashid and Dalshad Khudhur have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2229. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sally Rashid's family, including her parents and siblings, and Plaintiff Dalshad Khudhur's family, including his parents and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Sally Rashid and Dalshad Khudhur fearfully followed their families' journeys as they fled.

2230. ISIS looted and destroyed Plaintiff Sally Rashid and Plaintiff Dalshad Khudhur's real and personal property.

2231. As a result of ISIS's invasion, Plaintiffs Sally Rashid and Dalshad Khudhur have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Hassan Hussein**

2232. Plaintiff Hassan Hussein is a citizen of the United States and domiciled in the state of New York.

2233. Plaintiff Hassan Hussein has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2234. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq Plaintiff Hassan Hussein's family, including his daughter, mother, and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hassan Hussein fearfully followed his family's journey as they fled. ISIS captured two of Plaintiff Hassan Hussein's cousins and their families, and they remain missing.

2235. ISIS looted and destroyed Plaintiff Hassan Hussein's real and personal property.

2236. As a result of ISIS's invasion, Plaintiff Hassan Hussein has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hiyam Omar and Khaled Shamo**

2237. Plaintiffs Hiyam Omar and Khaled Shamo are citizens of the United States and domiciled in the state of California. Plaintiffs Hiyam Omar and Khaled Shamo are married.

2238. Plaintiffs Hiyam Omar and Khaled Shamo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2239. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq Plaintiff Hiyam Omar's family, including his parents and siblings, fled to Sinjar Mountain, where they were trapped until they could escape to Kurdistan. Plaintiff Khaled Shamo's family, including her mother and siblings, also fled to Sinjar Mountain. Plaintiffs Hiyam Omar and Khaled Shamo fearfully followed their families' journeys as they fled. Since the invasion, Plaintiff Hiyam Omar now suffers from depression.

2240. ISIS looted and destroyed Plaintiffs Hiyam Omar and Khaled Shamo's real and personal property.

2241. 1886. As a result of ISIS's invasion, Plaintiffs Hiyam Omar and Khaled Shamo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Laila Hesso**

2242. Plaintiff Laila Hesso is a citizen of the United States and domiciled in the state of Nebraska.

2243. Plaintiff Laila Hesso has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2244. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Laila Hesso's uncles, aunts, and cousins fled to Kurdistan. Plaintiff Laila Hesso fearfully followed her family's journey as they fled.

2245. As a result of ISIS's invasion, Plaintiff Laila Hesso has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Dakhil Elias and Mubad Rashow**

2246. Plaintiffs Dakhil Elias and Mubad Rashow are citizens of the United States and domiciled in the state of Washington. Plaintiffs Dakhil Elias and Mubad Rashow are married.

2247. Plaintiffs Dakhil Elias and Mubad Rashow have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2248. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Dakhil Elias's family, including his mother and siblings, and Plaintiff Mubad Rashow's family, including her mother and siblings, fled to Kurdistan. Plaintiffs Dakhil Elias and Mubad Rashow fearfully followed their families' journeys as they fled.

2249. ISIS looted and destroyed Plaintiffs Dakhil Elias and Plaintiff Mubad Rashow's real and personal property.

2250. As a result of ISIS's invasion, Plaintiff Dakhil Elias and Mubad Rashow have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Dejin Khidir**



2251. Plaintiff Dejin Khidir is a citizen of the United States and domiciled in the state of Virginia.

2252. Plaintiff Dejin Khidir has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2253. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Dejin Khidir fled to Turkey with her mother and sisters.

2254. As a result of ISIS's invasion, Plaintiff Dejin Khidir has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Muayad Yousif**

2255. Plaintiff Muayad Yousif is a citizen of the United States and domiciled in the state of Nebraska.

2256. Plaintiff Muayad Yousif has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2257. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Muayad Yousif fled to Kurdistan with his brother and brother's wife. Plaintiff Muayad Yousif's wife, who had been visiting family, separately fled to Sinjar Mountain, where she was trapped until she could escape to Kurdistan.

2258. ISIS looted and destroyed Plaintiff Muayad Yousif's real and personal property.

2259. As a result of ISIS's invasion, Plaintiff Muayad Yousif has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Sulaiman Hamo, Tawaf Merza, Zeyed Khudhur, Amer Khudher, and Khairi Khudher**

2260. Plaintiffs Sulaiman Hamo, Tawaf Merza, Zeyed Khudhur, Amer Khudher, and Khairi Khudher are citizens of the United States and domiciled in the state of Arizona. Plaintiffs Sulaiman Hamo and Tawaf Merza are married. Plaintiffs Zeyed Khudhur, Amer Khudher, and Khairi Khudher are their children.

2261. Plaintiffs Sulaiman Hamo, Tawaf Merza, Zeyed Khudhur, Amer Khudher, and Khairi Khudher have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2262. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Sulaiman Hamo, Tawaf Merza, Amer Khudher, and Khairi Khudher fled with Plaintiffs Sulaiman Hamo and Tawaf Merza's siblings to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Zeyed Khudhur fearfully followed his family's journey as they fled. ISIS killed Plaintiff Tawaf Merza's brother (Sulaiman Hamo's brother-in-law) and nephew (Plaintiffs Amer Khudher, Zeyed Khudher, and Khairi Khudhur's uncle and cousin, respectively). Plaintiffs Sulaiman Hamo and Tawaf Merza's daughter-in-law suffered a miscarriage on Sinjar Mountain.

2263. ISIS looted and destroyed Plaintiffs Sulaiman Hamo, Tawaf Merza, Zeyed Khudhur, Amer Khudher, and Khairi Khudher's real and personal property.

2264. As a result of ISIS's invasion, Plaintiffs Sulaiman Hamo, Tawaf Merza, Zeyed Khudhur, Amer Khudher, and Khairi Khudher have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Elyas Zaito and Ansam Zaito**

2265. Plaintiffs Elyas Zaito and Ansam Zaito are citizens of the United States and domiciled in the state of Virginia. Plaintiffs Elyas Zaito and Ansam Zaito are married.

2266. Plaintiffs Elyas Zaito and Ansam Zaito have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2267. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Elyas Zaito and Ansam Zaito's family, including their parents and siblings, fled to Kurdistan. Plaintiffs Elyas Zaito and Ansam Zaito fearfully followed their families' journeys as they fled. Plaintiff Elyas Zaito's cousin was killed by a bomb. Plaintiff Elyas Zaito's mother had a heart attack and passed away in 2017, shortly after returning to Mosul.

2268. ISIS looted and destroyed Plaintiffs Elyas Zaito and Ansam Zaito's real and personal property.

2269. As a result of ISIS's invasion, Plaintiffs Elyas Zaito and Ansam Zaito have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Mokhles Kheder and Qadisyah Hussein**

2270. Plaintiffs Mokhles Kheder and Qadisyah Hussein are citizens of the United States and domiciled in the state of Virginia. Plaintiff Mokhles Kheder and Plaintiff Qadisyah Hussein are married.

2271. Plaintiffs Mokhles Kheder and Qadisyah Hussein have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq

2272. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Mokhles Kheder's family, including his father and siblings, and Plaintiff Qadisyah Hussein's family, including her parents and siblings, fled to the Bashiqa Mountains, where they

were trapped until they were able to escape to Kurdistan. Plaintiffs Mokhles Kheder and Qadisyah Hussein fearfully followed their families' journeys as they fled. Plaintiff Mokhles Kheder's father died in the mountains. ISIS captured and killed Plaintiff Qadisyah Hussein's brother.

2273. ISIS looted and destroyed Plaintiffs Mokhles Kheder's and Qadisyah Hussein's real and personal property.

2274. As a result of ISIS's invasion, Plaintiffs Mokhles Kheder and Qadisyah Hussein have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Saadi Alosa**

2275. Plaintiff Saadi Alosa is a citizen of the United States and domiciled in the state of Virginia.

2276. Plaintiff Saadi Alosa has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2277. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saadi Alosa's family, including her parents, brothers, and their families, fled to the Bashika Mountains, where they were trapped until they were able to escape to Kurdistan. Plaintiff Saadi Alosa fearfully followed her family's journey as they fled. Plaintiff Saadi Alosa's mother suffered a broken arm and leg in the mountains. Plaintiff Saadi Alosa's father suffered a heart attack. Plaintiff Saadi Alosa's sister-in-law was missing for ten months.

2278. ISIS looted and destroyed Plaintiff Saadi Alosa's real and personal property.

2279. 1924. As a result of ISIS's invasion, Plaintiff Saadi Alosa has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Dilher Othman**

2280. Plaintiff Dilher Othman is a citizen of the United States and domiciled in the state of Nebraska.

2281. Plaintiff Dilher Othman has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2282. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Dilher Othman's father and siblings fled to Turkey. Plaintiff Dilher Othman was in Turkey at the time of the invasion and fearfully followed his family's journey as they fled. ISIS killed Plaintiff Dilher Othman's aunt and her family. Plaintiff Dilher Othman's grandmother and several uncles are still missing.

2283. As a result of ISIS's invasion, Plaintiff Dilher Othman has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Jalal Khalaf and Nahidah Hasan**

2284. Plaintiffs Jalal Khalaf and Nahidah Hasan are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Jalal Khalaf and Nahidah Hasan are married.

2285. Plaintiffs Jalal Khalaf and Nahidah Hasan have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2286. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Jalal Khalaf and Nahidah Hasan fled to Kurdistan with their child and Plaintiff Jalal Khalaf's parents, stepmother, and siblings. ISIS killed Plaintiff Nahidah Hasan's grandmother.

2287. ISIS looted and destroyed Plaintiffs Jalal Khalaf and Nahidah Hasan's real and personal property.

2288. As a result of ISIS's invasion, Plaintiffs Jalal Khalaf and Nahidah Hasan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Nawras Elias and Aveen Hussein**

2289. Plaintiffs Nawras Elias and Aveen Hussein are citizens of the United States and domiciled in the state of Virginia. Plaintiffs Nawras Elias and Aveen Hussein are married.

2290. Plaintiffs Nawras Elias and Aveen Hussein have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2291. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq Plaintiff Nawras Elias's family, including his siblings, and Plaintiff Aveen Hussein's family, including her parents and siblings, fled to Kurdistan. Plaintiffs Nawras Elias and Aveen Hussein fearfully followed their families' journeys as they fled.

2292. ISIS looted and destroyed Plaintiffs Nawras Elias' and Aveen Hussein's real and personal property.

2293. As a result of ISIS's invasion, Plaintiffs Nawras Elias and Aveen Hussein have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Nermeen Elias**

2294. Plaintiff Nermeen Elias is a citizen of the United States and domiciled in the state of Virginia.

2295. Plaintiff Nermeen Elias has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2296. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nermeen Elias's family, including her parents and siblings, fled to Kurdistan. Plaintiff Nermeen Elias fearfully followed her family's journey as they fled.

2297. ISIS looted and destroyed Plaintiff Nermeen Elias's real and personal property.

2298. As a result of ISIS's invasion, Plaintiff Nermeen Elias has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Salim Sulaiman and Wardah Hasan**

2299. Plaintiffs Salim Sulaiman and Wardah Hasan are citizens of the United States and domiciled in the state of Virginia. Plaintiffs Salim Sulaiman and Wardah Hasan are married.

2300. Plaintiffs Salim Sulaiman and Wardah Hasan have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2301. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Salim Sulaiman and Wardah Hasan's family, including their children and siblings, fled to Kurdistan. Plaintiffs Salim Sulaiman and Wardah Hasan fearfully followed their family's journeys as they fled. Plaintiff Wardah Hasan's brother could not flee because of his disability, and he died of starvation. Plaintiff Salim Sulaiman's sister died from illness and poor conditions in a camp for internally displaced persons.

2302. ISIS looted and destroyed Plaintiffs Salim Sulaiman and Wardah Hasan's real and personal property.

2303. As a result of ISIS's invasion, Plaintiffs Salim Sulaiman and Wardah Hasan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Jalal Alhasan and Hazrat Ali**

2304. Plaintiffs Jalal Alhasan and Hazrat Ali are citizens of the United States and domiciled in the state of Virginia. Plaintiffs Jalal Alhasan and Hazrat Ali are married.

2305. Plaintiffs Jalal Alhasan and Hazrat Ali have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2306. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Jalal Alhasan and Hazrat Ali's children fled to Kurdistan. Plaintiff Jalal Alhasan's sister and Plaintiff Hazrat Ali's mother and brother also fled their homes. Plaintiffs Jalal Alhasan and Hazrat Ali fearfully followed their families' journey as they fled. ISIS captured Plaintiff Hazrat Ali's niece and her family. Shortly after they were captured, Plaintiff Hazrat Ali's other brother died of a heart attack. ISIS killed Plaintiff Hazrat Ali's niece, along with her husband and her son. Plaintiff Hazrat Ali's niece's 10-year-old daughter later managed to escape.

2307. ISIS looted and destroyed Plaintiffs Jalal Alhasan and Hazrat Ali's real and personal property.

2308. As a result of ISIS's invasion, Plaintiff Jalal Alhasan and Hasrat Ali have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ahmed Ibrahim, Bahar Mourad, and George Ibrahim**

2309. Plaintiffs Ahmed Ibrahim, Bahar Mourad, and George Ibrahim are citizens of the United States and domiciled in the state of Pennsylvania. Plaintiffs Ahmed Ibrahim and Bahar Mourad are married. Plaintiff George Ibrahim is their son.

2310. Plaintiffs Ahmed Ibrahim, Bahar Mourad, and George Ibrahim have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.



2311. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, some of Plaintiff Ahmed Ibrahim's siblings fled to Sinjar Mountain, while others fled directly to Kurdistan. Plaintiff Bahar Mourad's siblings fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Ahmed Ibrahim, Bahar Mourad, and George Ibrahim fearfully followed their families' journeys as they fled. Plaintiff Ahmed Ibrahim's cousin was killed in a car bombing.

2312. ISIS looted and destroyed Plaintiffs Ahmed Ibrahim, Bahar Mourad real and personal property.

2313. As a result of ISIS's invasion, Plaintiffs Ahmed Ibrahim, Bahar Mourad, and George Ibrahim have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Hajar Ali, Ziyad Faeedi, and Mazin Faeedi**

2314. Plaintiffs Hajar Ali, Ziyad Faeedi, and Mazin Faeedi are citizens of the United States and domiciled in the state of Virginia. Plaintiffs Hajar Ali and Ziyad Faeedi are married. Plaintiff Mazin Faeedi is their son.

2315. Plaintiffs Hajar Ali, Ziyad Faeedi, and Mazin Faeedi have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2316. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hajar Ali's brothers and their families fled to Turkey. Plaintiff Ziyad Faeedi's brothers fled to Kurdistan. Plaintiffs Hajar Ali, Ziyad Faeedi, and Mazin Faeedi fearfully followed their family's journey as they fled. ISIS captured Plaintiff Hajar Ali's neice, and Plaintiff Hajar Ali's brother suffered a heart attack and died as a result.

2317. ISIS looted and destroyed Plaintiffs Hajar Ali, Ziyad Faeedi, and Mazin Faeedi's real and personal property.

2318. As a result of ISIS's invasion, Plaintiffs Hajar Ali, Ziyad Faeedi, and Mazin Faeedi have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khaleel Haskan**

2319. Plaintiff Khaleel Haskan is a citizen of the United States and domiciled in the state of Nebraska.

2320. Plaintiff Khaleel Haskan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2321. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Khaleel Haskan fled to Kurdistan with his wife, son, mother, and siblings.

2322. ISIS looted and destroyed Plaintiff Khaleel Haskan's real and personal property.

2323. As a result of ISIS's invasion, Plaintiff Khaleel Haskan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Alan Hasckan, Harry Hasckan, Faisal Yazdeen, Sameera Darweesh, and J.K.**

2324. Plaintiffs Alan Hasckan, Harry Hasckan, Faisal Yazdeen, Sameera Darweesh, and J.K. are citizens of the United States and domiciled in the state of Michigan. Plaintiffs Alan Hasckan, Harry Hasckan, and Faisal Yazdeen are brothers. Plaintiffs Faisal Yazdeen and Sameera Darweesh are married, and J.K. is their son.

2325. Plaintiffs Alan Hasckan, Harry Hasckan, Faisal Yazdeen, Sameera Darweesh, and J.K. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2326. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Harry Hasckan, Faisal Yazdeen, Sameera Darweesh, and J.K. fled to Sinjar Mountain with their family, where they were trapped until they were able to escape to Kurdistan. Plaintiff Alan Hasckan fearfully followed his family's journey as they fled. ISIS shot at Plaintiffs Harry Hasckan, Faisal Yazdeen, Sameera Darweesh, and J.K., and their family as they fled. Plaintiff Harry Hasckan had to carry one of his brothers because he was paralyzed. Plaintiff J.K., who was one and a half years old at the time of the invasion, became very ill on Sinjar Mountain due to lack of food and water, and had to be urgently hospitalized when he arrived in Kurdistan. Plaintiff Sameera Darweesh's parents and siblings separately fled to Sinjar Mountain with their families, where they were also trapped until they were able to escape to Kurdistan. ISIS captured one of Plaintiff Sameera Darweesh's cousins, and she was taken to various locations including Syria, before she was able to escape. ISIS also killed some of Plaintiff Sameera Darweesh's parents' cousins.

2327. ISIS looted and destroyed Plaintiffs Alan Hasckan, Harry Hasckan, Faisal Yazdeen, Sameera Darweesh, and J.K.'s real and personal property.

2328. As a result of ISIS's invasion, Plaintiffs Alan Hasckan, Harry Hasckan, Faisal Yazdeen, Sameera Darweesh, and J.K. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Zina Yazdeen**

2329. Plaintiff Zina Yazdeen is a citizen of the United States and domiciled in the state of Michigan.

2330. Plaintiff Zina Yazdeen has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2331. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Zina Yazdeen fled to Sinjar Mountain with her newborn baby, her husband, and her husband's family, where they were trapped until they were able to escape to Kurdistan. As they fled, her husband's disabled father had to be carried by his son, until they were able to find a donkey to carry him. Plaintiff Zina Yazdeen's family fled separately to Sinjar Mountain, where they were also trapped until they were able to escape to Kurdistan. Following the invasion, Plaintiff Zina Yazdeen suffered from mental health issues that required medication.

2332. ISIS looted and destroyed Plaintiff Zina Yazdeen's real and personal property.

2333. As a result of ISIS's invasion, Plaintiff Zina Yazdeen has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Zahra Hamo and Mirza Khalaf**

2334. Plaintiffs Zahra Hamo and Mirza Khalaf are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Zahra Hamo and Mirza Khalaf are married.

2335. Plaintiffs Zahra Hamo and Mirza Khalaf have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2336. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Zahra Hamo fled to Sinjar Mountain with her and Plaintiff Mirza Khalaf's children, where they were trapped until they was able to escape to Kurdistan and then to Turkey.. Plaintiff Mirza Khalaf, who was visiting the United States at the time, fearfully followed his family's journey as they fled. Plaintiff Zahra Hamo's siblings also fled to Sinjar Mountain and then to

Kurdistan. Since the invasion, Plaintiff Mirza Khalaf has been diagnosed with various health issues, including a mental disorder.

2337. ISIS looted and destroyed Plaintiffs Zahra Hamo and Mirza Khalaf's real and personal property.

2338. As a result of ISIS's invasion, Plaintiffs Zahra Hamo and Mirza Khalaf have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Saido Hesso and Kheder Hadji**

2339. Plaintiffs Saido Hesso and Kheder Hadji are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Saido Hesso is Plaintiff Kheder Hadji's father.

2340. Plaintiffs Saido Hesso and Kheder Hadji have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2341. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Saido Hesso's brothers and their families—approximately thirty people—tried to flee to Sinjar Mountain. At a checkpoint though on the way to the mountain, they were stopped by ISIS while Plaintiff Kheder Hadji was on the phone with them. ISIS stole their jewelry, but they were able to escape when the ISIS guards were distracted. They fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Saido Hesso and Kheder Hadji fearfully followed their family's journey as they fled. Plaintiff Kheder Hadji's uncle on his maternal side also fled to Sinjar Mountain with his family, where they were trapped until they were able to escape to Kurdistan.

2342. ISIS looted and destroyed Plaintiffs Saido Hesso and Kheder Hadji's real and personal property.

2343. As a result of ISIS's invasion, Plaintiffs Saido Hesso and Kheder Hadji have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Sheelan Jadaan**

2344. Plaintiff Sheelan Jadaan is a citizen of the United States and domiciled in the state of Michigan.

2345. Plaintiff Sheelan Jadaan has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2346. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sheelan Jadaan fled to Sinjar Mountain with her mother and siblings, where she was trapped until she was able to escape to Kurdistan. Plaintiff Sheelan Jadaan's sister suffered multiple seizures while fleeing from ISIS, and frequently loss consciousness. Plaintiff Sheelan Jadaan's grandmother, aunt, and two cousins were captured by ISIS. They were held for many years and taken to various locations, including in Syria, until they were able to escape. Plaintiff Sheelan Jadaan's grandmother died shortly after escaping from captivity.

2347. ISIS looted and destroyed Plaintiff Sheelan Jadaan's real and personal property.

2348. As a result of ISIS's invasion, Plaintiff Sheelan Jadaan has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Kafia Masto**

2349. Plaintiff Kafia Masto is a citizen of the United States and domiciled in the state of Nebraska.

2350. Plaintiff Kafia Masto has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2351. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Kafia Masto's family, including her siblings and her husband's brother, fled to Kurdistan. Plaintiff Kafia Masto fearfully followed her family's journey as they fled. Plaintiff Kafia Masto and her husband had already relocated to Turkey prior to the invasion after her husband's niece was kidnapped in 2012. Plaintiff Kafia Masto's husband's niece is still missing. Plaintiff Kafia Masto has sought mental health treatment as a result of the trauma of the invasion.

2352. As a result of ISIS's invasion, Plaintiff Kafia Masto has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Amer Hasan, Fareda Kader, and Jwane Hasan**

2353. Plaintiffs Amer Hasan, Fareda Kader, and Jwane Hasan are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Amer Hasan and Fareda Kader are married and Jwane Hasan is their daughter.

2354. Plaintiffs Amer Hasan, Fareda Kader and Jwane Hasan have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2355. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Amer Hasan's siblings and their families fled to Kurdistan. Plaintiff Fareda Kader's sister and uncles fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Amer Hasan, Fareda Kader, and Jwane Hasan fearfully followed their family's journey as they fled.

2356. ISIS looted and destroyed Plaintiffs Amer Hasan, Fareda Kader, and Jwane Hasan's real and personal property.

2357. As a result of ISIS's invasion, Plaintiffs Amer Hasan, Fareda Kader, and Jwane Hasan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Falah Salo**

2358. Plaintiff Falah Salo is a citizen of the United States and domiciled in the state of Nebraska.

2359. Plaintiff Falah Salo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2360. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Falah Salo's mother and siblings fled to Kurdistan. Plaintiff Falah Salo fearfully followed his family's journey as they fled.

2361. ISIS looted and destroyed Plaintiff Falah Salo's real and personal property.

2362. As a result of ISIS's invasion, Plaintiff Falah Salo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Rahan Alali, Rana Alali, Zoher Alali, Basim Alali, Bsaam Alali, Hatem Alali, Zeed Alale, and Leza Alali**

2363. Plaintiffs Rahan Alali, Rana Alali, Zoher Alali, Basim Alali, Bsaam Alali, Hatem Alali, Zeed Alale, and Leza Alali are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Rahan Alali, Rana Alali, Zoher Alali, Basim Alali, Bsaam Alali, Hatem Alali, Zeed Alale, and Leza Alali are siblings.



2364. Plaintiffs Rahan Alali, Rana Alali, Zoher Alali, Basim Alali, Bsaam Alali, Hatem Alali, Zeed Alale, and Leza Alali have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2365. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Rahan Ali, Rana Ali, Zeed Alale, and Leza Alali fled to Kurdistan with their father, grandfather and extended family. Plaintiffs Zoher Alali, Basim Alali, Bsaam Alali, and Hatem Alali fearfully followed their family's journey as they fled.

2366. ISIS looted and destroyed Plaintiffs Rahan Alali, Rana Alali, Zoher Alali, Basim Alali, Bsaam Alali, Hatem Alali, Zeed Alale, and Leza Alali's real and personal property.

2367. As a result of ISIS's invasion, Plaintiffs Rahan Alali, Rana Alali, Zoher Alali, Basim Alali, Bsaam Alali, Hatem Alali, Zeed Alale, and Leza Alali have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Solaf Alsadun**

2368. Plaintiff Solaf Alsadun is a citizen of the United States and domiciled in the state of Nebraska.

2369. Plaintiff Solaf Alsadun has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2370. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Solaf Alsadun fled to Kurdistan with her parents and siblings.

2371. ISIS looted and destroyed Plaintiff Solaf Alsadun's personal property.

2372. As a result of ISIS's invasion, Plaintiff Solaf Alsadun has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Raghda Al Saydo**

2373. Plaintiff Raghda Al Saydo is a citizen of the United States and domiciled in the state of Nebraska.

2374. Plaintiff Raghda Al Saydo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2375. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Raghda Al Saydo fled to Kurdistan with her parents and siblings. Plaintiff Raghda Al Saydo's uncles and cousins fled separately, also to Kurdistan.

2376. ISIS looted and destroyed Plaintiff Raghda Al Saydo's real and personal property.

2377. As a result of ISIS's invasion, Plaintiff Raghda Al Saydo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Nafeh Kassem**

2378. Plaintiff Nafeh Kassem is a citizen of the United States and domiciled in the state of Nebraska.

2379. Plaintiff Nafeh Kassem has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2380. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Nafeh Kassem's sister fled to Kurdistan with her children and husband. Plaintiff Nafeh Kassem fearfully followed her family's journey as they fled.

2381. ISIS looted and destroyed Plaintiff Plaintiff Nafeh Kassem's real and personal property.

2382. As a result of ISIS's invasion, Plaintiff Nafeh Kassem has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Salman Elias**

2383. Plaintiff Salman Elias is a citizen of the United States and domiciled in the state of Nebraska.

2384. Plaintiff Salman Elias has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2385. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Salman Elias fled to Sinjar Mountain with his parents, wife, and siblings, where they were trapped for approximately one week until they were able to escape to Kurdistan. Plaintiff Salman Elias's cousin and his family were captured by ISIS. Plaintiff Salman Elias's cousin remains missing to this day. Salman Elias's uncles were held by ISIS until they were able to escape after approximately three days. Plaintiff Salman Elias has suffered from mental health issues since the invasion.

2386. ISIS looted and destroyed Plaintiff Salman Elias's real and personal property.

2387. As a result of ISIS's invasion, Plaintiff Salman Elias has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hazem Al Yezidi**

2388. Plaintiff Hazem Al Yezidi is a citizen of the United States and domiciled in the state of Nebraska.

2389. Plaintiff Hazem Al Yezidi has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2390. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, some of Plaintiff Hazem Al Yezidi's cousins fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hazem Al Yezidi fearfully followed his family's journey as they fled.

2391. ISIS looted and destroyed Plaintiff Hazem Al Yezidi's real and personal property.

2392. As a result of ISIS's invasion, Plaintiff Hazem Al Yezidi has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Fadwa Daher**

2393. Plaintiff Fadwa Daher is a citizen of the United States and domiciled in the state of Nebraska.

2394. Plaintiff Fadwa Daher has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2395. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Fadwa Daher's family, including her grandmother and uncle fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Fadwa Daher fearfully followed her family's journey as they fled. Plaintiff Fadwa Daher's nephew also fled to Sinjar Mountain, and his newborn baby died due to the difficult conditions on the mountain.

2396. ISIS looted and destroyed Plaintiff Fadwa Daher real and personal property.

2397. As a result of ISIS's invasion, Plaintiff Fadwa Daher has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Rashed Khder and Hanan Thanoon**

2398. Plaintiffs Rashed Khder and Hanan Thanoon are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Rashed Khder and Hanan Thanoon are married.

2399. Plaintiffs Rashed Khder and Hanan Thanoon have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2400. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Rashed Khder and Hanan Thanoon's family, including Plaintiff Rashed Khder's father and siblings, and Plaintiff Hanan Thanoon's mother and siblings, fled to Kurdistan. Plaintiff Hanan Thanoon's brother first fled to Bashiqa Mountain, where he stayed for a few days, until he was able to escape to Kurdistan. Plaintiffs Rashed Khder and Hanan Thanoon fearfully followed their family's journey as they fled. ISIS killed Plaintiff Rashed Khder's cousin as he was trying to reach his wife. Plaintiff Hanan Thanoon's brother later died from a heart attack after seeing that his family home had been destroyed by ISIS.

2401. ISIS looted and destroyed Plaintiffs Rashed Khder and Hanan Thanoon's real and personal property.

2402. As a result of ISIS's invasion, Plaintiffs Rashed Khder and Hanan Thanoon have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Muntasir Khudhur and Nawal Haji**

2403. Plaintiffs Muntasir Khudhur and Nawal Haji are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Muntasir Khudhur and Nawal Haji are married.

2404. Plaintiffs Muntasir Khudhur and Nawal Haji have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2405. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Muntasir Khudhur and Nawal Haji's families, including their parents and siblings, fled to Kurdistan. Plaintiffs Muntasir Khudhur and Nawal Haji, who had left Iraq for Turkey in 2013 after receiving threats, fearfully followed their family's journey as they fled.

2406. ISIS looted and destroyed Plaintiffs Muntasir Khudhur and Nawal Haji's real and personal property.

2407. As a result of ISIS's invasion, Plaintiffs Muntasir Khudhur and Nawal Haji have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Mahdi Hussein**

2408. Plaintiff Mahdi Hussein is a citizen of the United States and domiciled in the state of Nebraska.

2409. Plaintiff Mahdi Hussein has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2410. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Mahdi Hussein fled from Baghdad to Kurdistan with his wife. Plaintiff Mahdi Hussein's wife was 6 months pregnant at the time and was suffering complications, and they were unable to get to a doctor due to the ISIS attacks. This caused Plaintiff Mahdi Hussein's wife to lose the baby.

2411. ISIS looted and destroyed Plaintiff Mahdi Hussein's real and personal property.

2412. As a result of ISIS's invasion, Plaintiff Mahdi Hussein has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and loss of his family's society and counsel.

**Amir Aldarwish**

2413. Plaintiff Amir Aldarwish is a citizen of the United States and domiciled in the state of Texas.

2414. Plaintiff Amir Aldarwish has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2415. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Amir Aldarwish's family, including his parents and siblings, fled to Kurdistan. Plaintiff Amir Aldarwish, who had fled Iraq earlier after receiving threats, fearfully followed his family's journey as they fled. ISIS killed members of Plaintiff Amir Aldarwish's siblings' spouses' families, including his brother's wife's entire family.

2416. ISIS looted and destroyed Plaintiff Amir Aldarwish's real and personal property.

2417. As a result of ISIS's invasion, Plaintiff Amir Aldarwish has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Basma Shekh and A.A.**

2418. Plaintiffs Basma Shekh and A.A. are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Basma Shekh is Plaintiff A.A.'s mother.

2419. Plaintiffs Basma Shekh and A.A. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2420. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Basma Shekh and A.A. fled to Kurdistan with Plaintiff Basma Shekh's husband's family. Plaintiff Basma Shekh's mother, who was disabled and lived with her other children, was unable to flee when ISIS initially invaded. She and her children had to hide from ISIS in their home, and were trapped there for approximately ten days before they were able to escape to Kurdistan.

2421. ISIS looted and destroyed Plaintiffs Basma Shekh and A.A.'s real and personal property.

2422. As a result of ISIS's invasion, Plaintiffs Basma Shekh and A.A. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Shamo Alhamy, Shereen Murad, Shahnaz Alhamy, and Sherevan Alhamy,**

2423. Plaintiffs Shamo Alhamy, Shereen Murad, Shahnaz Alhamy, and Sherevan Alhamy are citizens of the United States. Plaintiffs Shamo Alhamy, Shereen Murad, and Shahnaz Alhamy are domiciled in the state of Nebraska, and Plaintiff Sherevan Alhamy is domiciled in Paris, France. Plaintiffs Shamo Alhamy and Shereen Murad are married, and Plaintiffs Shahnaz Alhamy and Sherevan Alhamy are their children.

2424. Plaintiffs Shamo Alhamy, Shereen Murad, Shahnaz Alhamy, and Sherevan Alhamy, have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2425. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Shamo Almahy and Shereen Murad's family, including some of their children, siblings, and Plaintiff Shamo Alhamy's mother fled Sinjar. Some family members fled to Sinjar



Mountain, where were trapped until they were able to escape to Kurdistan. Other family members fled directly to Kurdistan. Plaintiffs Shamo Alhamy, Shereen Murad, Shahnaz Alhamy, and Sherevan Alhamy fearfully followed their family's journey as they fled. Plaintiff Shereen Murad's brother, who was sick at the time, had to hide at home with Plaintiff Shereen Murad's niece in Sinjar, until somebody could carry him up Sinjar Mountain. He got sicker in the mountain and passed away two years ago. Plaintiff Shereen Murad's niece has suffered numerous miscarriages as a result of the trauma she suffered during the invasion.

2426. ISIS looted and destroyed Plaintiffs Shamo Alhamy, Shereen Murad, Shahnaz Alhamy, and Sherevan Alhamy's real and personal property.

2427. As a result of ISIS's invasion, Plaintiffs Shamo Alhamy, Shereen Murad, Shahnaz Alhamy, and Sherevan Alhamy have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Khalaf Sulaiman, Dakheel Sulaiman, and Zaidan Sulaiman**

2428. Plaintiffs Khalaf Sulaiman, Dakheel Sulaiman, and Zaidan Sulaiman are citizens of the United States. Plaintiffs Khalaf Sulaiman and Zaidan Sulaiman are domiciled in the state of Nebraska, and Plaintiff Dakheel Sulaiman is domiciled in Paris, France. Plaintiffs Khalaf Sulaiman, Dakheel Sulaiman, and Zaidan Sulaiman are brothers.

2429. Plaintiffs Khalaf Sulaiman, Dakheel Sulaiman, and Zaidan Sulaiman have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2430. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Khalaf Sulaiman, Dakheel Sulaiman, and Zaidan Sulaiman's family, including their parents, siblings, and extended family, fled to Sinjar Mountain, where they were trapped until

they were able to escape to Kurdistan. Plaintiffs Khalaf Sulaimanm, Dakheel Sulaiman, and Zaidan Sulaiman fearfully followed their family's journey as they fled.

2431. ISIS looted and destroyed Plaintiffs Khalaf Sulaimanm, Dakheel Sulaiman, and Zaidan Sulaiman's real and personal property.

2432. As a result of ISIS's invasion, Plaintiffs Khalaf Sulaimanm, Dakheel Sulaiman, and Zaidan Sulaiman have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Muqdad Alhamy and Ghazalah Sulaiman**

2433. Plaintiffs Muqdad Alhamy and Ghazalah Sulaiman are citizens of the United States and domiciled in the state of Illinois. Plaintiffs Muqdad Alhamy and Ghazalah Sulaiman are married.

2434. Plaintiffs Muqdad Alhamy and Ghazalah Sulaiman have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2435. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Muqdad Alhamy's family, including his siblings, grandmother, aunts, and uncles, fled Sinjar. Some family members fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Other family members fled directly to Kurdistan. Plaintiff Ghazalah Sulaiman's family, including her parents, sisters, and grandmother fled to Zakho. Plaintiffs Muqdad Alhamy and Ghazalah Sulaiman, who left Sinjar just weeks before ISIS invaded, fearfully followed their family's journey as they fled. Plaintiff Ghazalah Sulaiman's sister, who was pregnant at the time, suffered from a miscarriage as she fled, and has suffered multiple miscarriages since due to the trauma she suffered. As a result of ISIS's invasion, Plaintiff Muqdad Alhamy could not continue his medical studies, and lost his chance to become a doctor.

2436. ISIS looted and destroyed Plaintiffs Muqdad Alhamy and Ghazalah Alhamy's real and personal property.

2437. As a result of ISIS's invasion, Plaintiffs Muqdad Alhamy and Ghazalah Alhamy have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Shahla Alhamy and Salih Haskan**

2438. Plaintiffs Shahla Alhamy and Salih Haskan are citizens of the United States and domiciled in the state of Illinois. Plaintiffs Shahla Alhamy and Salih Haskan are married.

2439. Plaintiffs Shahla Alhamy and Salih Haskan have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2440. In particular, in anticipation of ISIS's invasion of Sinjar, Plaintiffs Shahla Alhamy and Salih Haskan fled to Kurdistan in June 2014. Plaintiff Shahla Alhamy went to the United States, and Plaintiff Salih Haskan returned to his village. On or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Salih Haskan fled with his family, including his parents and siblings, to Kurdistan. Other members of Plaintiff Shahla Alhamy's family similarly fled to Sinjar when ISIS invaded, including her grandmother. Some family members went to Kurdistan, and others went to Sinjar Mountain where they were trapped until they were able to escape to Kurdistan.

2441. ISIS looted and destroyed Plaintiffs Shahla Alhamy and Salih Haskan's real and personal property.

2442. As a result of ISIS's invasion, Plaintiffs Shahla Alhamy and Salih Haskan have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Navin Khalaf**

2443. Plaintiff Navin Khalaf is a citizen of the United States and domiciled in the state of Illinois.

2444. Plaintiff Navin Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2445. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Navin Khalaf fled to Kurdistan with her sister and cousins. Plaintiff Navin Khalaf's parents and some of her other siblings and her family separately fled to Kurdistan. Plaintiff Navin Khalaf's other sister and her family fled to the Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. While in Kurdistan, Plaintiff Navin Khalaf fearfully followed her family's journey. While escaping, Plaintiff Navin Khalaf saw ISIS shooting other Yazidis.

2446. ISIS looted and destroyed Plaintiff Navin Khalaf's real and personal property.

2447. As a result of ISIS's invasion, Plaintiff Navin Khalaf experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Salam Sheikh**

2448. Plaintiff Salam Sheikh is a citizen of the United States and domiciled in the state of Texas.

2449. Plaintiff Salam Sheikh has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2450. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Salam Sheikh's family, including his mother and sisters, fled to Kurdistan. Plaintiff Salam Sheikh fearfully followed his family's journey as they fled. Before they fled, Plaintiff Salam

Sheikh's family were trapped in their house for thirteen days, without food. During this time, Plaintiff Salam Sheikh's mother, who was disabled, did not have access to care and almost died.

2451. ISIS looted and destroyed Plaintiff Salam Sheikh's real and personal property.

2452. As a result of ISIS's invasion, Plaintiff Salam Sheikh has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Basim Namr, Sari Turki, Nazar Kheder, H.K., and B.K**

2453. Plaintiffs Basim Namr, Sari Turki, Nazar Kheder, H.K., and B.K., are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Basim Namr and Sari Turki are married. Plaintiffs Nazar Kheder, H.K., and B.K., are their children.

2454. Plaintiffs Basim Namr, Sari Turki, Nazar Kheder, H.K., and B.K. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2455. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Basim Namr, Sari Turki, Nazar Kheder, H.K., and B.K., fled to Sinjar Mountain with Plaintiff Basim Namr's parents, siblings, and their families, where they were trapped until they were able to escape to Kurdistan. Plaintiff Basim Namr fell while escaping and hurt his torso, which continues to limit his mobility and requires medication today. Plaintiff Sari Turki's parents and siblings separately fled to Sinjar Mountain, and then to Kurdistan.

2456. ISIS looted and destroyed Plaintiffs Basim Namr, Sari Turki, Nazar Kheder, H.K., and B.K.'s real and personal property.

2457. As a result of ISIS's invasion, Plaintiffs Basim Namr, Sari Turki, Nazar Kheder, H.K., and B.K., have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ronza Fehed and Samo Samo**

2458. Plaintiffs Ronza Fehed and Samo Samo are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Ronza Fehed and Samo Samo are married.

2459. Plaintiffs Ronza Fehed and Samo Samo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2460. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ronza Fehed's parents and siblings fled to Kurdistan. Plaintiff Samo Samo's family, including his mother and brother, separately fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Ronza Fehed and Samo Samo fearfully followed their family's journey as they fled. ISIS captured Plaintiff Ronza Fehed's uncle and cousins. Plaintiff Ronza Fehed's uncle escaped but her cousins are still missing. Plaintiff Samo Samo's mother and brother were hospitalized for more than a month when they reached Kurdistan, due to hypertension and diabetes as a result of the strenuous journey from Sinjar and the starvation they experienced. Plaintiff Ronza Fehed's father, who suffered from asthma, kidney problems, and cancer, died in Kurdistan.

2461. ISIS looted and destroyed Plaintiffs Ronza Fehed and Samo Samo's real and personal property.

2462. As a result of ISIS's invasion, Plaintiffs Ronza Fehed and Samo Samo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Shazo Al Saleem, Marvin Sulaiman, Bahar Sulaiman, and Hozhin Suliman**

2463. Plaintiffs Shazo Al Saleem, Marvin Sulaiman, Bahar Sulaiman, and Hozhin Suliman are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Shazo Al Saleem is the mother of Plaintiffs Marvin Sulaiman, Bahar Sulaiman, and Hozhin Suliman.

2464. Plaintiffs Shazo Al Saleem, Marvin Sulaiman, Bahar Sulaiman, and Hozhin Suliman have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2465. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Shazo Al Saleem, Marvin Sulaiman, Bahar Sulaiman, and Hozhin Suliman fled to Erbil.

2466. ISIS looted and destroyed Plaintiffs Shazo Al Saleem and Marvin Sulaiman's real and personal property.

2467. As a result of ISIS's invasion, Plaintiffs Shazo Al Saleem and Marvin Sulaiman have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Kheder Darweesh and Asmar Eedo**

2468. Plaintiffs Kheder Darweesh and Asmar Eedo are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Kheder Darweesh and Asmar Eedo are married.

2469. Plaintiffs Kheder Darweesh and Asmar Eedo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2470. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Kheder Darweesh and Asmar Eedo fled to Sinjar Mountain with their two sons and their families where they were trapped until they were able to escape to Kurdistan. Plaintiff Kheder

Darweesh fell while on Sinjar Mountain and injured his knee, which continues to hurt to this day. Plaintiff Asmar Eedo suffers from psychological trauma and sees a doctor for these issues.

2471. ISIS looted and destroyed Plaintiffs Kheder Darweesh and Asmar Eedo's real and personal property.

2472. As a result of ISIS's invasion, Plaintiffs Kheder Darweesh and Asmar Eedo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Seno Murad and Aishe Murad**

2473. Plaintiffs Seno Murad and Aishe Murad are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Seno Murad and Aishe Murad are married.

2474. Plaintiffs Seno Murad and Aishe Murad have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2475. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Seno Murad and Aishe Murad fled to Shehan, and then Turkey, with their siblings and children. Plaintiff Aishe Murad's parents, who were elderly, were unable to flee when ISIS invaded and were killed. Plaintiff Aishe Murad suffers from psychological issues since the invasion.

2476. ISIS looted and destroyed Plaintiff Seno Murad and Aishe Murad real and personal property.

2477. As a result of ISIS's invasion, Plaintiff Seno Murad and Aishe Murad have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Skfan Al Niamo and Steven Alnahmo**



2478. Plaintiffs Skfan Al Niamo and Steven Alnahmo are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Skfan Al Niamo and Steven Alnahmo are brothers.

2479. Plaintiffs Skfan Al Niamo and Steven Alnahmo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2480. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Skfan Al Niamo and Steven Alnahmo's family, including their parents and siblings, fled to Kurdistan. Plaintiffs Skfan Al Niamo and Steven Alnahmo fearfully followed their family's journey as they fled.

2481. ISIS looted and destroyed Plaintiff Skfan Al Niamo and Steven Alnahmo's real and personal property.

2482. As a result of ISIS's invasion, Plaintiffs Skfan Al Niamo and Steven Alnahmo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Halah Blasiny**

2483. Plaintiff Halah Blasiny is a citizen of the United States and domiciled in the state of Nebraska.

2484. Plaintiff Halah Blasiny has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2485. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Halah Blasiny fled to Turkey with her parents and siblings. Plaintiff Halah Blasiny's father had been injured in an ISIS attack a few months prior while working at his bakery in Mosul, and later received surgery on his leg.

2486. ISIS looted and destroyed Plaintiff Halah Blasiny's real and personal property.

2487. As a result of ISIS's invasion, Plaintiff Halah Blasiny has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Kitbiya Haidar, Haidar Kari, Faiza Kari, Firdaus Kari, Shaima Kari, and F.K.**

2488. Plaintiffs Kitbiya Haidar, Haidar Kari, Faiza Kari, Firdaus Kari, Shaima Kari, and F.K. are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Kitbiya Haidar is the mother of Plaintiffs Haidar Kari, Faiza Kari, Firdaus Kari, Shaima Kari, and F.K.

2489. Plaintiffs Kitbiya Haidar, Haidar Kari, Faiza Kari, Firdaus Kari, Shaima Kari, and F.K. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2490. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Kitbiya Haidar, Haidar Kari, Faiza Kari, Firdaus Kari, Shaima Kari, and F.K. fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Kitbiya Haidar's mother and siblings separately fled to Kurdistan. ISIS killed Plaintiff Kitbiya Haidar's uncle.

2491. ISIS looted and destroyed Plaintiffs Kitbiya Haidar, Haidar Kari, Faiza Kari, Firdaus Kari, Shaima Kari, and F.K.'s real and personal property.

2492. As a result of ISIS's invasion, Plaintiffs Kitbiya Haidar, Haidar Kari, Faiza Kari, Firdaus Kari, Shaima Kari, and F.K. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Fawaz Blasiny**

2493. Plaintiff Fawaz Blasiny is a citizen of the United States and domiciled in the state of Nebraska.

2494. Plaintiff Fawaz Blasiny has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2495. 2130. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Fawaz Blasiny's brothers, aunts, and uncles fled to Kurdistan. Plaintiff Fawaz Blasiny fearfully followed his family's journey as they fled.

2496. ISIS looted and destroyed Plaintiff Fawaz Blasiny's real and personal property.

2497. As a result of ISIS's invasion, Plaintiff Fawaz Blasiny has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Hikmat Khalaf**

2498. Plaintiff Hikmat Khalaf is a citizen of the United States and domiciled in the state of Nebraska.

2499. Plaintiff Hikmat Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2500. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hikmat Khalaf's family, including his mother and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Hikmat Khalaf fearfully followed his family's journey as they fled. ISIS killed four of Plaintiff Hikmat Khalaf's cousins.

2501. ISIS looted and destroyed Plaintiff Hikmat Khalaf's real and personal property.

2502. As a result of ISIS's invasion, Plaintiff Hikmat Khalaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Parker Burjus and Sabah Hussein**

2503. Plaintiffs Parker Burjus and Sabah Hussein are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Parker Burjus and Sabah Hussein are married.

2504. Plaintiffs Parker Burjus and Sabah Hussein have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2505. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Parker Burjus and Sabah Hussein's family, including their parents and siblings, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Parker Burjus and Sabah Hussein fearfully followed their family's journey as they fled. Plaintiff Parker Burjus's mother still suffers from injuries to her legs sustained on the mountain. Since the invasion, Plaintiff Sabah Hussein has been diagnosed with severe depression and anxiety, and is taking medications.

2506. ISIS looted and destroyed Plaintiffs Parker Burjus and Sabah Hussein's real and personal property.

2507. As a result of ISIS's invasion, Plaintiffs Parker Burjus and Sabah Hussein have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Kamal Ismail and Jwani Hadi**

2508. Plaintiffs Kamal Ismail and Jwani Hadi are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Kamal Ismail and Jwani Hadi are married.

2509. Plaintiffs Kamal Ismail and Jwani Hadi have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2510. In particular, just prior to ISIS's invasion of Sinjar, Iraq on or about August 3, 2014, Plaintiff Kamal Ismail's brothers and their families fled their homes due to increasing ISIS attacks. One of Plaintiff Kamal Ismail's brothers suffered a heart attack and died while escaping from ISIS. Plaintiff Kamal Ismail's other brother and his family separately fled to Kurdistan. Plaintiff Jwani Ismail's siblings fled Mosul to Kurdistan. Plaintiffs Kamal Ismail and Jwani Hadi fearfully followed their family's journey as they fled. Due to the stress of the invasion, Plaintiff Kamal Ismail suffered a heart problem for which he had to undergo surgery. Since the invasion, Plaintiffs Kamal Ismail and Jwani Hadi suffer from mental health problems, undergo therapy, and take medication.

2511. ISIS looted and destroyed Plaintiffs Kamal Ismail and Jwani Hadi's real and personal property.

2512. As a result of ISIS's invasion, Plaintiffs Kamal Ismail and Jwani Hadi have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Haji Blasiny, Hinar Kochi, Mumtaz Blasiny, Qaisar Blasiny, Bari Blasiny, and Haiveen Blasiny**

2513. Plaintiffs Haji Blasiny, Hinar Kochi, Mumtaz Blasiny, Qaisar Blasiny, Bari Blasiny, and Haiveen Blasiny are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Haji Blasiny and Hinar Kochi are married, and Plaintiffs Mumtaz Blasiny, Qaisar Blasiny, Bari Blasiny, and Haiveen Blasiny are their children.

2514. Plaintiffs Haji Blasiny, Hinar Kochi, Mumtaz Blasiny, Qaisar Blasiny, Bari Blasiny, and Haiveen Blasiny have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2515. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Haji Blasiny, Hinar Kochi, Mumtaz Blasiny, Qaisar Blasiny, Bari Blasiny, and Haiveen Blasiny fled to Turkey.

2516. ISIS looted and destroyed Plaintiffs Haji Blasiny, Hinar Kochi, Mumtaz Blasiny, Qaisar Blasiny, Bari Blasiny, and Haiveen Blasiny's real and personal property.

2517. As a result of ISIS's invasion, Plaintiffs Haji Blasiny, Hinar Kochi, Mumtaz Blasiny, Qaisar Blasiny, Bari Blasiny, and Haiveen Blasiny have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Hussein Haji**

2518. Plaintiff Hussein Haji is a citizen of the United States and domiciled in the state of Nebraska.

2519. Plaintiff Hussein Haji has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2520. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Hussein Haji's parents, grandmother, and siblings fled to Kurdistan. Plaintiff Hussein Haji, who was working in Kurdistan at the time, fearfully followed his family's journey as they fled. Both of Plaintiff Hussein Haji's parents were disabled prior to the invasion – his mother was unable to walk and had to be carried to their car, and his father struggled physically while fleeing due to a spinal injury. Two of Plaintiff Hussein Haji brothers were shot and injured

by ISIS as they were fleeing. Plaintiff Hussein Haji's cousin was also shot, and later had to have his leg amputated as a result. Plaintiff Hussein Haji's grandfather was initially left behind during the ISIS invasion, as he was too elderly to flee and there was no available space in the car. He hid in his home while ISIS raided their village, and was later rescued by Plaintiff Hussein Haji's brothers.

2521. ISIS looted and destroyed Plaintiff Hussein Haji's real and personal property.

2522. As a result of ISIS's invasion, Plaintiff Hussein Haji has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Faleeha Barehamy, Tareq Darweesh, Basman Darweesh, H.D., Si.D., Sa. D.**

2523. Plaintiffs Faleeha Barehamy, Tareq Darweesh, Basman Darweesh, H.D., Si.D., and Sa.D. are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Faleeha Berhamy is Plaintiffs Tareq Darweesh, Basman Darweesh, H.D., Si.D., and Sa.D.'s mother.

2524. Plaintiff Faleeha Barehamy, Tareq Darweesh, Basman Darweesh, H.D., Si.D., and Sa.D. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2525. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Faleeha Barehamy, Tareq Darweesh, Basman Darweesh, H.D., Si.D., and Sa.D. fled to Turkey. Plaintiff Faleeha Berhamy's husband (Plaintiffs Tareq Darweesh, Basman Darweesh, H.D., Si.D., and Sa.D.'s father), was working in Mosul when ISIS invaded and was captured by ISIS. He was held in captivity for approximately 6 months until he was able to escape, and was beaten severely while in captivity. Plaintiffs Tareq Darweesh, Basman Darweesh, H.D., Si.D., and Sa.D.'s grandparents died while trying to flee from ISIS.

2526. ISIS looted and destroyed Plaintiffs Faleeha Barehamy, Tareq Darweesh, Basman Darweesh, H.D., Si.D., and Sa.D.'s real and personal property.

2527. As a result of ISIS's invasion, Plaintiffs Faleeha Barehamy, Tareq Darweesh, Basman Darweesh, H.D., Si.D., and Sa.D. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Maherah Khille**

2528. Plaintiff Maherah Khille is a citizen of the United States and domiciled in the state of Nebraska.

2529. Plaintiff Maherah Khille has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2530. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Maherah Khille's family, including her parents, siblings, and their families fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Maherah Khille fearfully followed her family's journey as they fled. Plaintiff Maherah Khille's aunt was captured with her family, many of whom are still missing. Plaintiff Maherah Khille now suffers from mental health issues since the invasion.

2531. ISIS looted and destroyed Plaintiff Maherah Khille's real and personal property.

2532. As a result of ISIS's invasion, Plaintiff Maherah Khille has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Sardar Rashid and Shaha Malo**



2533. Plaintiffs Sardar Rashid and Shaha Malo are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Sardar Rashid and Shaha Malo are married.

2534. Plaintiffs Sardar Rashid and Shaha Malo have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2535. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Sardar Rashid and Shaha Malo fled to Kurdistan with their children, Plaintiff Shaha Malo's sister and sister's family. Plaintiffs Sardar Rashid and Shaha Malo's daughter still has nightmares due to fear from the invasion and has sought mental health counseling.

2536. ISIS looted and destroyed Plaintiffs Sardar Rashid and Shaha Malo's real and personal property.

2537. As a result of ISIS's invasion, Plaintiffs Sardar Rashid and Shaha Malo have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Jakleen Smo**

2538. Plaintiff Jakleen Smo is a citizen of the United States and domiciled in the state of Nebraska.

2539. Plaintiff Jakleen Smo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2540. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Jakleen Smo's family, including her aunt and her family, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Jakleen Smo fearfully followed her family's journey as they fled. ISIS shot at Plaintiff Jakleen Smo's family as they fled. ISIS killed Plaintiff Jakleen Smo's aunt's father, who was trying to protect the family.

Plaintiff Jakleen Smo's cousin, who was a doctor, was also trapped on Sinjar Mountain as she was helping those there. Whilst on the mountain, Plaintiff Jakleen Smo's cousin became ill and almost died.

2541. ISIS looted and destroyed Plaintiff Jakleen Smo's real and personal property.

2542. As a result of ISIS's invasion, Plaintiff Jakleen Smo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Farida Khalaf**

2543. Plaintiff Farida Khalaf is a citizen of the United States and domiciled in the state of Nebraska.

2544. Plaintiff Farida Khalaf has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2545. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Farida Khalaf's aunts, uncles, and cousins fled to Kurdistan. Plaintiff Farida Khalaf fearfully followed her family's journey as they fled. ISIS captured several of Farida Khalaf's cousins and their families, and they are still missing.

2546. ISIS looted and destroyed Plaintiff Farida Khalaf's real and personal property.

2547. As a result of ISIS's invasion, Plaintiff Farida Khalaf has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Sulaf Darweesh and Mahabad Darweesh**

2548. Plaintiffs Sulaf Darweesh and Mahabad Darweesh are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Sulaf Darweesh and Mahabad Darweesh are sisters.

2549. Plaintiffs Sulaf Darweesh and Mahabad Darweesh have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2550. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Sulaf Darweesh and Mahabad Darweesh's family, including their grandmother, siblings, uncle and extended family fled to Kurdistan. Plaintiffs Sulaf Darweesh and Mahabad Darweesh fearfully followed their family's journey as they fled. Since the invasion Plaintiff Sulaf Darweesh's suffers from mental health issues and still has nightmares.

2551. ISIS looted and destroyed Plaintiffs Sulaf Darweesh and Mahabad Darweesh's real and personal property.

2552. As a result of ISIS's invasion, Plaintiffs Sulaf Darweesh and Mahabad Darweesh have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Arkan Adee and Salwa Adee**

2553. Plaintiffs Arkan Adee and Salwa Adee are citizens of the United States and domiciled in the state of Nebraska. Plaintiffs Arkan Adee and Salwa Adee are married.

2554. Plaintiffs Arkan Adee and Salwa Adee have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2555. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Arkan Adee's family, including his parents and siblings, fled to Kurdistan, and Plaintiff Salwa Adee's family, including her parents and siblings, fled to Turkey. Plaintiffs Arkan

Adee and Salwa Adee fearfully followed their family's journey as they fled. ISIS captured 16 members of Plaintiff Salwa Adee's uncle's family. Some were killed, and many still remain missing.

2556. ISIS looted and destroyed Plaintiffs Arkan Adee and Salwa Adee's real and personal property.

2557. As a result of ISIS's invasion, Plaintiffs Arkan Adee and Salwa Adee have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Sameer Khudhur**

2558. Plaintiff Sameer Khudhur is a citizen of the United States and domiciled in the state of Nebraska.

2559. Plaintiff Sameer Khudhur has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2560. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Sameer Khudhur's family, including his parents, siblings, grandparents, and fiancé, fled to Kurdistan. Plaintiff Sameer Khudhur fearfully followed his family's journey as they fled. Since the invasion, Plaintiff Sameer Khudhur has suffered from mental health issues.

2561. ISIS looted and destroyed Plaintiff Sameer Khudhur's real and personal property.

2562. As a result of ISIS's invasion, Plaintiff Sameer Khudhur has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Janan Al Omar**

2563. Plaintiff Janan Al Omar is a citizen of the United States and domiciled in the state of Nebraska.

2564. Plaintiff Janan Al Omar has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2565. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Janan Al Omar fled to Kurdistan with her parents, siblings, and uncles.

2566. ISIS looted and destroyed Plaintiff Janan Al Omar's real and personal property.

2567. As a result of ISIS's invasion, Plaintiff Janan Al Omar has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Jyan Haji**

2568. Plaintiff Jyan Haji is a citizen of the United States and domiciled in the state of Nebraska.

2569. Plaintiff Jyan Haji has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2570. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Jyan Haji's mother, siblings, and their families, fled to Kurdistan. Plaintiff Jyan Haji's aunt fled to Sinjar Mountain, where she was trapped until she was able to escape to Kurdistan. Plaintiff Jyan Haji fearfully followed her family's journey as they fled. Plaintiff Jyan Haji's mother and siblings have suffered from diabetes since the invasion. Since the invasion, Plaintiff Jyan Haji and her husband have had to take medication for anxiety.

2571. ISIS looted and destroyed Plaintiff Jyan Haji's real and personal property.

2572. As a result of ISIS's invasion, Plaintiff Jyan Haji has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of her family's society and counsel.

**Badri Namo**

2573. Plaintiff Badri Namo is a citizen of the United States and domiciled in the state of Nebraska.

2574. Plaintiff Badri Namo has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2575. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Badri Namo's family, including his parents, siblings, and their families fled to Turkey and Kurdistan. Plaintiff Badri Namo, who was suffering from leukemia at that time, fearfully followed his family's journey as they fled. Plaintiff Badri Namo's father suffered multiple strokes after the invasion, and later died. Since the invasion, Plaintiff Badri Namo suffered mental trauma for which he had to seek psychiatric therapy.

2576. As a result of ISIS's invasion, Plaintiff Badri Namo experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Raeed Khadida and Bilqeez Khalaf**

2577. Plaintiffs Raeed Khadida and Bilqeez Khalaf are citizens of the United States and domiciled in the state of Idaho. Plaintiffs Raeed Khadida and Bilqeez Khalaf are married.

2578. Plaintiffs Raeed Khadida and Bilqeez Khalaf have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2579. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Raed Khadida and Bilqeez Khalaf's families, including Plaintiff Raed Khadida's paternal grandmother and Plaintiff Bilqeez Khalaf's siblings and grandparents, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Raed Khadida and Bilqeez Khalaf fearfully followed their families' journey as they fled. ISIS captured Plaintiff Raed Khadida's grandmother, who is still missing to this day. Plaintiff Bilqeez Khalaf's father lost an eye while escaping due to ISIS gunfire. Plaintiff Bilqeez Khalaf's sister developed a blood disease after drinking contaminated water on Sinjar Mountain, and still suffers from the effects today.

2580. ISIS looted and destroyed Plaintiffs Raed Khadida and Bilqeez Khalaf's real and personal property.

2581. As a result of ISIS's invasion, Plaintiffs Raed Khadida and Bilqeez Khalaf have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Faiz Al Sloo**

2582. Plaintiff Faiz Al Sloo is a citizen of the United States and domiciled in the state of Nebraska.

2583. Plaintiff Faiz Al Sloo suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2584. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Faiz Al Sloo's family, including his mother and siblings, fled briefly to Kurdistan. Plaintiff Faiz Al Sloo fearfully followed his family's journey as they fled.

2585. ISIS looted and destroyed Plaintiff Faiz Al Sloo's real and personal property.

2586. As a result of ISIS's invasion, Plaintiff Faiz Al Sloo has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**Rosa Nahamat and D.K.**

2587. Plaintiffs Rosa Nahamat and D.K. are citizens of the United States and domiciled in the state of Nebraska. Plaintiff Rosa Nahamat is Plaintiff D.K.'s mother.

2588. Plaintiffs Rosa Nahamat and D.K. have suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2589. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiffs Rosa Nahamat's family, including her parents, sister, grandparents, aunts, and uncles fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiffs Rosa Nahamat and D.K. fearfully followed their family's journey as they fled. ISIS killed two of Plaintiff Rosa Nahamat's uncles. Plaintiff Rosa Nahamat's grandparents passed away shortly after hearing news of her uncles' deaths. ISIS captured Plaintiff Rosa Nahamat's sister and her family for two days, but they managed to escape.

2590. ISIS looted and destroyed Plaintiffs Rosa Nahamat and D.K.'s real and personal property.

2591. As a result of ISIS's invasion, Plaintiffs Rosa Nahamat and D.K. have experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of their family's society and counsel.

**Ashti Al Hamka**



2592. Plaintiff Ashti Al Hamka is a citizen of the United States and domiciled in the state of Arizona.

2593. Plaintiff Ashti Al Hamka has suffered severe injuries as a result of ISIS's campaign of terrorism targeting Yazidis in Iraq.

2594. In particular, on or about August 3, 2014, in response to ISIS's invasion of Sinjar, Iraq, Plaintiff Ashti Al Hamka's family, including his uncles and cousins, fled to Sinjar Mountain, where they were trapped until they were able to escape to Kurdistan. Plaintiff Ashti Al Hamka fearfully followed his family's journey as they fled. Whilst on the mountain, two of Plaintiff Ashti Al Hamka's uncles died of starvation.

2595. ISIS looted and destroyed Plaintiff Ashti Al Hamka's real and personal property.

2596. As a result of ISIS's invasion, Plaintiff Ashti Al Hamka has experienced economic loss; severe mental anguish; extreme emotional pain and suffering; loss of property; and/or loss of his family's society and counsel.

**COUNT ONE: VIOLATION OF THE ATA, 18 U.S.C. § 2333(D)**  
**(JASTA, Aiding and Abetting Liability)**

2597. Plaintiffs incorporate their allegations above.

2598. Lafarge and LCS pleaded guilty to violating 18 U.S.C. § 2339B in the Eastern District of New York on October 18, 2022.

2599. The United States has designated ISIS as an FTO under § 219 of the Immigration and Nationality Act (8 U.S.C. § 1189) since 2004 under the name Al-Qaeda in Iraq and, later, under the name of ISIS and associated aliases.

2600. The United States has designated ANF as an FTO under § 219 of the Immigration and Nationality Act (8 U.S.C. § 1189) since 2012.

2601. ISIS and ANF committed violent acts or acts dangerous to human life that are a violation of the criminal laws of the United States or of any State, and that would be a criminal violation if committed within the jurisdiction of the United States or of any State, including genocide, murder, hostage taking, widescale sexual abuse including rape, forced labor, human trafficking, financing terrorism, use of weapons of mass destruction, the destruction of property by fire or explosive, and commission of acts of terrorism transcending national boundaries. ISIS's and ANF's acts violated the criminal laws of the United States, or would have violated those laws had they been committed within the jurisdiction of the United States, including 18 U.S.C. §§ 844, 1091, 1111, 1203, 1361, 1589, 1590, 2242, 2332a, 2339B, and 2339C(a)(1)(B). Defendants, ISIS, and ANF structured their transactions to disguise the nature of their support, in further violation of 18 U.S.C. § 2339A. Defendants knew that their substantial assistance and material support would be used by FTOs in the preparation for, or in carrying out, the above acts.

2602. ISIS's and ANF's acts appeared to be intended to intimidate or coerce civilian populations of Syria, Iraq, and the United States, among others, to influence the policy of the Syrian, Iraqi, Kurdish, American, and other governments by intimidation or coercion, and to affect the conduct of a government by mass destruction, assassination, rape, kidnapping, enslavement, pillage and other acts.

2603. ISIS's and ANF's attacks occurred primarily outside the territorial jurisdiction of the United States, and transcended national boundaries in terms of the means by which they were accomplished, the persons they appeared intended to intimidate or coerce, and the locale in which their perpetrators operated.

2604. Defendants aided and abetted ISIS's and ANF's acts of international terrorism by knowingly providing substantial assistance, including by making cash and covert payments

through the U.S. financial system and foreign shell companies and intermediaries to, purchasing raw material from, selling cement to, and making revenue-sharing agreements with the FTOs, and by failing to safely shut down and evacuate the Cement Plant, thereby placing tons of valuable cement and raw materials, including materials that can be used to make explosives, in the hands of ISIS. Defendants knew that their material support was provided to FTOs and would be used to commit acts of international terrorism.

2605. Defendants provided substantial support to ISIS and ANF, knowing that the reasonable and foreseeable risk—and occurrence in fact—was that the FTOs would in turn perform numerous wrongful acts, including the murder of thousands of civilians, among them U.S. citizens and relatives of Plaintiffs. Defendants were generally and specifically aware of FTOs’ tortious, terrorist scheme, and their role in it. Defendants were generally and specifically aware that their actions would put further resources into FTOs’ hands to commit further terrorist acts. Defendants therefore knowingly and substantially aided and abetted the FTOs, including ISIS, in committing the acts of international terrorism that injured Plaintiffs.

2606. Plaintiffs are U.S. nationals who were injured in their persons, properties, and/or businesses by reason of Defendants’ conduct. Plaintiffs suffered economic, physical, and/or emotional injuries proximately caused by Defendants’ conduct.

2607. As a result of Defendants’ violation of 18 U.S.C. § 2333(d), Plaintiffs are entitled to recover economic and non-economic damages, including solatium damages.

**COUNT TWO: VIOLATION OF THE ATA, 18 U.S.C. § 2333(D)**  
**(JASTA, Conspiracy Liability)**

2608. Plaintiffs incorporate their allegations above.

2609. Lafarge and LCS pleaded guilty to violating 18 U.S.C. § 2339B in the Eastern District of New York on October 18, 2022.

2610. The United States has designated ISIS as an FTO under § 219 of the Immigration and Nationality Act (8 U.S.C. § 1189) since 2004 under the name Al-Qaeda in Iraq.

2611. The United States has designated ANF as an FTO under § 219 of the Immigration and Nationality Act (8 U.S.C. § 1189) since 2012.

2612. Defendants conspired by making an agreement with FTOs to, among other activities and goals, provide material support for those organizations in violation of 18 U.S.C. § 2339B. Defendants, ISIS, and ANF structured their transactions to disguise the nature of their support, in further violation of 18 U.S.C. § 2339A. These FTOs foreseeably attacked civilians, including U.S. civilians, throughout the conspiracy, with Defendants' knowledge. A foreseeable and indeed inevitable outcome of that conspiracy was the terrorist acts that caused Plaintiffs' injuries.

2613. It was reasonable and foreseeable that, as part of the conspiracy and in furtherance of the scheme to support acts of international terrorism, ISIS and ANF would, and in fact did, commit acts of international terrorism, including violent acts or acts dangerous to human life that are a violation of the criminal laws of the United States or of any State, and that would be a criminal violation if committed within the jurisdiction of the United States or of any State, including the destruction of property by fire or explosive, genocide, murder, hostage taking, widescale sexual abuse including rape, forced labor, human trafficking, financing terrorism, use of weapons of mass destruction, and commission of acts of terrorism transcending national boundaries. ISIS's and ANF's acts violated the criminal laws of the United States, or would have violated those laws had they been committed within the jurisdiction of the United States, including 18 U.S.C. §§ 844, 1091, 1111, 1203, 1361, 1589, 1590, 2242, 2332a, 2339B, and 2339C(a)(1)(B). Defendants knew that

acts of international terrorism were part of the conspiracy and that FTOs were and would carry out the above acts.

2614. Defendants, by conspiring with ISIS and ANF, unlawfully and willfully conspired with the persons who committed acts of international terrorism, knowing that ISIS and ANF had carried out and continued to carry out acts intended to cause death or serious bodily injury to civilians and/or others not taking an active part in the hostilities in a situation of armed conflict, and that the purpose of ISIS's and ANF's acts was to intimidate the Syrian, Iraqi, Kurdish, Yazidi, American, and other populations, and to compel the United States and other governments to retreat from territory in Syria, Iraq, and in other countries and take other action in line with ISIS's warped ideology.

2615. ISIS's and ANF's acts appeared to be intended to intimidate or coerce a civilian population; to influence the policy of the Syrian, Iraqi, Kurdish, American, and other governments by intimidation or coercion; and to affect the conduct of a government by mass destruction, assassination, rape, kidnapping, enslavement, pillage, and other acts.

2616. ISIS's and ANF's attacks occurred primarily outside the territorial jurisdiction of the United States and transcended national boundaries in terms of the means by which they are accomplished, the persons they appeared intended to intimidate or coerce, and the locale in which their perpetrators operated.

2617. Plaintiffs are U.S. nationals who were injured in their persons, properties, and/or businesses by reason of Defendants' conduct. Plaintiffs suffered economic, physical, and emotional injuries proximately caused by Defendants' conduct.

2618. As a result of Defendant's provision of funds and other assistance to ISIS in violation of 18 U.S.C. § 2333(d), Plaintiffs are entitled to recover economic and non-economic damages, including solatium damages.

**JURY DEMAND**

2619. In accordance with Federal Rule of Civil Procedure 38(b), Plaintiffs demand a trial by jury on all issues so triable.

**PRAYER FOR RELIEF**

Plaintiffs request that the Court:

- (a) Enter judgment against Defendants finding them jointly and severally liable under the Anti-Terrorism Act, 18 U.S.C. § 2333;
- (b) Award Plaintiffs compensatory damages to the maximum extent permitted by law, and treble any compensatory damages awarded under the Anti-Terrorism Act pursuant to 18 U.S.C. § 2333(d);
- (c) Award Plaintiffs their attorney's fees and costs incurred in this action, pursuant to 18 U.S.C. § 2333(d);
- (d) Award Plaintiffs prejudgment interest; and
- (e) Award Plaintiffs any such further relief the Court deems just and proper.

Dated: August 1, 2024

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